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Report
of The Governor's Committee
to Investigate the Affairs of
The Philadelphia Registration Commission

JUNE 2, 1941

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ADMINISTRATION
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Report of
The Governor's Committee to Investigate
the Affairs of
The Philadelphia Registration Commission

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GOVERNOR'S COMMITTEE TO INVESTIGATE
THE AFFAIRS OF
THE PHILADELPHIA REGISTRATION COMMISSION

June 2, 1941

Hon. Arthur H. James,
Governor of Pennsylvania,
Harrisburg, Pennsylvania.

Dear Governor James:

On December 9, 1940 your Excellency appointed this Committee to investigate the affairs of the Philadelphia Registration Commission. We have made a thorough inquiry. This was made possible by your complete cooperation.

Your Committee conceived its purposes to be:

1. Investigation of specific charges made against the Registration Commission.
2. Fixing, as far as possible, the degree of responsibility in the case of any dereliction found.
3. General appraisal of the existing methods for administering permanent registration in Philadelphia.
4. Proposal of improvements to be made either through amendments to the law or administrative changes.

Believing that an investigation pursuant to these purposes should be objective and free of political considerations, and that it required trained scientific treatment, the Committee secured the services of Dr. John Perry Horlacher of the University of Pennsylvania, an expert in the field of public administration, as its research director.

Hearings were held, at which all interested parties were given an opportunity to be heard. Numerous specific allegations were checked. Independent studies were made and an administrative survey conducted.

The Committee is appreciative of the co-operation given by the Registration Commission. Every possible courtesy was extended.

Your Committee makes its report herewith, and lists below, for your convenience, a summary of its findings and recommendations. Footnotes indicate the pages in the report where supporting data will be found.

Your Committee finds:

In general -

1. Although charges to that effect have been aired, there is no evidence of fraud or criminality on the part of members or employees of the Registration Commission.

In respect to illegal registrations in the voting lists -

1. In the light of all the facts disclosed by the investigation, the Registration Commission substantially failed to discharge its duty to maintain current voting lists, although no evidence was found that this failure resulted in fraud.¹.

2. The number of registration affidavits improperly in the district registers is between 100,549 and 128,965 or between 9.2 and 11.8 per cent of the total registrations, as determined by a scientific process of sampling.².

1. Pages 25, 26.

2. Page 9.

3. Charges made by the Committee of Seventy that the Commission failed to take adequate measures to remove illegal registrations from 297 district binders after being furnished information of the bad condition of these binders are warranted. A year and a half after notice to the Commission - a period covering three elections - ten per cent or more of these illegal registrations were still in the binders.¹.

4. Charges of "overloading" in certain apartment houses, published in the Philadelphia Record, are substantially correct.².

5. Charges of registrations from vacant lots and empty dwellings, published in the Philadelphia Record, although unfounded in certain instances are justified in a number of cases.³.

6. Charges of registrations in excess of the adult population in eight wards of the city, published in the Philadelphia Record, cannot be confirmed, although investigation casts doubt upon their truth.⁴.

7. Most of the charges against the Commission filed with the United States Senate Committee to Investigate Campaign Expenditures were unfounded. Allegations of "padded" registrations from certain lodging houses and the Y. M. C. A. hotel were verified.⁵.

In respect to the problem of removals -

1. The enormous peak of work in disposing of removal cards and strike-off petitions just prior to elections, which cannot be handled efficiently, is caused by failure to effect changes of address in registration records continuously and substantially throughout the year, although the means to do this are available.⁶.

2. The Commission does not request or make use of reports of removals from public service companies, moving concerns, or rental agents.⁷.

3. Too many removal cards go into a "can't locate" file because of avoidable deficiencies.⁸.

1. Pages 18-22.	5. Pages 10-13.
2. Pages 14,15.	6. Pages 40,41.
3. Pages 15-17.	7. Page 38.
4. Pages 17,18.	8. Pages 30-32.

4. Charges of gross mishandling of a group of 2300 removal cards, made before the House Elections Committee on May 9, 1941, are not substantiated.¹.

5. Processing change of party cards in periods just preceding elections impedes the vital work of handling removal cards and strike-off petitions.².

6. The "office removal card" is a desirable innovation but is improperly used because not time stamped.³.

7. The procedure for holding strike-off hearings is unsatisfactory and needs improvement.⁴.

8. Charges of failure to notify petitioners in strike-off proceedings are unfounded.⁵.

9. Charges of failure to dispose of 21,000 strike-off petitions filed in August and September of 1939, made before the House Elections Committee on May 9, 1941, are not proved.⁶.

In respect to the assistance record on registration

affidavits -

1. The Commission has not taken effective steps to correct extensive errors in the assistance record on registration affidavits although apprised of this condition through a report made more than two years ago.⁷.

2. The Commission has not acted, as required by law, to cancel the assistance entry on affidavits where electors have voted without assistance.⁸.

In respect to administration of the permanent reg-

istration system -

1. The irreducible essentials of effective administration are competent personnel and single administrative responsibility and control.⁹.

1. Pages 33,34.

2. Page 40.

3. Page 32.

4. Pages 36,37.

5. Page 36.

6. Page 36.

7. Pages 43-45.

8. Pages 45,46.

9. Pages 47,48.

2. A five man Commission with administrative powers vested in the Commission as a body has resulted in confusion in administrative responsibility and supervision, a condition which makes efficiency impossible. Unified direction and single responsibility do not in fact exist, and the office of the Chief Clerk is not used towards these ends.¹.

3. The process of choosing new employees indicates a low degree of selectivity and is influenced by political considerations.².

4. A substantial percentage of the Commission's employees are not qualified for the work they are performing, insofar as their previous employment experience and education indicate.³.

5. Employees are very inadequately trained by the Commission for the work they must do.⁴.

6. The administration of permanent registration shows a lack of administrative planning, which has contributed to the ineffective handling of this great administrative task.⁵.

7. Considerable variance exists among the members of the Commission in the amount of time they devote to their duties. Some of the Commissioners have been politically active.⁶.

8. A serious weakness is the lack of aggressive minority representation on the Commission.⁷.

9. Sound principles of personnel management are disregarded in handling salaries and promotions.⁸.

10. Public relations is a neglected phase of the administrative work of the Commission.⁹.

11. The Commission, creditably, has made a number of substantial improvements in administrative procedure although existing practice could still be materially bettered.¹⁰.

12. The filing system used by the Commission, which is the crucial mechanism for administering permanent registration, needs simplification.¹¹.

1. Pages 49-54.

2. Pages 60,61.

3. Pages 62-64.

4. Page 61.

5. Pages 54-58.

6. Pages 58,59.

7. Page 59.

8. Pages 65,66.

9. Pages 66-68.

10. Pages 68-70.

11. Pages 70,71.

13. There is no periodic audit of files, and filing performance is substandard. Between 14,208 and 33,881 affidavits are misfiled in the district binders, and between 25,137 and 49,182 affidavits are misfiled in the General Register.¹.

14. A 30 per cent loss of time results from the wholly unnecessary procedure in stripping new addresses on affidavits in processing removal cards.².

15. There is no method of proving receipt of removal cards by the Commission's offices, a major defect. Electors complain that cards they execute and deliver to party workers never reach the Commission.³.

16. The check of affidavits against the voting check lists is not most efficiently handled, and no check of voting lists against the record of voting entered by election officials on the reverse of the registration affidavit is made.⁴.

17. No systematic check of affidavits to correct errors appearing thereon is made.⁵.

18. The use of tabulating equipment renders the triplicate copy of the affidavit unnecessary for preparing street lists. The triplicate now serves no purpose whatever, although requiring extensive time to maintain.⁶.

19. Certain work of the Commission has been interfered with by the failure of the Bureau of Vital Statistics to transmit reports of deaths as required by the Act.⁷.

20. Serious limitations are imposed upon the work of the Commission because the problem of location and physical arrangement of the registration offices has not been successfully dealt with.⁸.

In view of these findings your Committee makes these recommendations for legislative changes:

1. Make the Chairman of the Commission its responsible administrator with exclusive power to appoint and remove employees. He should be named by the Governor, rather than selected by the members of

1. Pages 71,72.

2. Page 73.

3. Page 73.

4. Pages 74,75.

5. Page 76.

6. Page 76.

7. Page 77.

8. Pages 77,78.

the Commission, and thus made accountable to the Governor for efficient administration of permanent registration.¹.

2. Eliminate incompetence and politics by requiring all employees to be chosen under a merit system.².

3. Make mandatory the annual use of the mail check to cleanse the voting lists.³.

4. Require each licensee of a hotel, tenement or lodging house to report to the Commission annually, and at other times on request, the names of all adults resident for two months or more. Require such licensees to designate persons who have moved and the addresses to which they have moved, and to maintain a register containing the names of all adults resident for two months or more, which shall be open to public inspection.⁴.

5. Extend the deadline for receipt of removal cards to 50 days prior to primaries and general elections and 40 days prior to municipal elections.⁵.

6. As an aid in cleansing the lists, reduce from four to two years the period during which failure to vote shall result in cancellation of registration.⁶.

7. Withdraw the right to effect change of party status on registration affidavits between primaries and elections because it serves no purpose and impedes other vital work.⁷.

8. Constitute deliberate withholding or destruction of a removal card a criminal offense.⁸.

9. Provide for the holding of strike-off hearings by two Commissioners, one from each party, so that two hearings can proceed simultaneously and disposition of strike-offs be speeded up.⁹.

10. Remove from the Act the requirement of a triplicate copy of the registration affidavit.¹⁰.

11. Make the use of registrant's identification cards mandatory, as an aid to office routine and improved public relations.¹¹.

1. Page 54.
2. Page 64.
3. Page 41.
4. Page 39.
5. Page 33.
6. Page 40.

7. Page 40.
8. Page 33.
9. Page 37.
10. Page 76.
11. Page 67.

12. Provide that failure of the Registrar of Vital Statistics to transmit reports of death as required by the Act shall be cause for removal.¹.

These proposals, along with other minor clarifications of the Permanent Registration Act, have been embodied in a bill prepared by the Committee.

Your Committee also recommends that the Registration Commission make the following administrative changes:

1. Institute the practice of systematic and energetic canvass of the entire city by registration inspectors.².

2. Make use of utility reports of removals. Since other registration offices find these valuable, they should receive a further and more careful trial.³.

3. Conduct an educational campaign to facilitate a more regular flow of removal cards throughout the year.⁴.

4. Adopt a system of scheduling strike-off hearings which will reduce the inconvenience to electors and accelerate disposition of cases.⁵.

5. Require "office removal cards" to be time stamped as are other removal cards.⁶.

6. Cite to the District Attorney, for appropriate action, the names of persons who file strike-off petitions deliberately to harass electors.⁷.

7. Embody important and recurrent points decided at strike-off hearings in formal opinions and adopt formal regulations of procedure.⁸.

8. Adopt the practice of planning in connection with all phases of the administrative work of registration.⁹.

9. Undertake improvements in the Commission's public relations through radio broadcasts, educational campaigns in the press, and otherwise.¹⁰.

1. Page 77.
2. Page 41.
3. Page 39.
4. Page 33.
5. Page 37.

6. Page 32.
7. Page 37.
8. Page 37.
9. Pages 54-58.
10. Pages 66,67.

10. Put in effect a carefully devised plan of job classification and salary standardization as a prerequisite to developing a sound policy of promotions.¹.

11. Prepare a training manual and subject all employees to a period of intensive instruction to better qualify them for their duties.².

12. Carry out the plan for internal reorganization drafted by the Philadelphia Committee of the Pennsylvania Economy League.³.

13. Establish a filing system in which all subsidiary files are coordinated with the General Register as a master file.⁴.

14. Permit no employees to have access to the General Register except expert file clerks.⁵.

15. Inaugurate periodic audit of all files to locate misfiled items.⁶.

16. Discontinue the procedure of stripping new addresses on registration affidavits.⁷.

17. Employ removal cards with detachable stubs to be used to prove receipt of the removal card.⁸.

18. Effectively systematize the comparison of voting check lists with registration affidavits and make, at the same time, a check to determine whether the record of voting has been properly completed on the reverse of the affidavit.⁹.

19. Institute a system of auditing live affidavits to detect and rectify errors.¹⁰.

20. Rearrange the registration offices in accordance with the floor plans prepared by the Philadelphia Committee of the Pennsylvania Economy League, and make a vigorous effort to obtain a satisfactory ground floor location.¹¹.

1. Page 66.
2. Pages 61,62.
3. Page 70.
4. Page 71.
5. Page 71.

6. Pages 71,72.
7. Page 73.
8. Pages 73,74.
9. Pages 74,75.
10. Page 76.
11. Pages 77,78.

Your Committee is convinced that a system of permanent registration is a marked advance over personal registration, and that it is entirely workable. Although a more satisfactory achievement in Philadelphia is possible with the existing machinery, the latter has two major weaknesses. It provides no assurance of competent personnel nor of effective administrative management. With these remedied, and other recommended improvements effected, the policy of permanent registration will be adequately implemented.

Respectfully yours,

Benjamin L. Long Chairman

Charles C. Rohlfing Secretary

David J. Smyth

Joshua Ash Pearson

H. Benedict Ripkee

INTRODUCTION

In the early fall of 1940, the Committee of Seventy charged the Philadelphia Registration Commission with inefficient administration of permanent registration, and complained that laxity was the cause of large numbers of illegal registrations in the voting lists.

Immediately prior to the general election in November 1940, the Philadelphia Record published a series of articles by David Wittels, charging the Registration Commission with failure to carry out the law; that many persons were registered from vacant lots and dwellings; that many apartment houses had persons registered from the premises who had long since moved or died; and that the registration rolls were padded to a serious extent.

Complaints filed with the United States District Attorney of the Eastern District of Pennsylvania resulted in directions to the September Grand Jury to inquire into the activities of the Philadelphia Registration Commission and determine whether a conspiracy to deprive persons of their right to vote existed.

Thus, a great deal of adverse publicity was directed toward the Commission at this time, which the Commission considered unwarranted. It therefore requested the Governor of Pennsylvania to appoint a Committee to impartially investigate its affairs. On December 9, 1940, the Honorable Arthur H. James appointed Benjamin L. Long, Dr. Charles C. Rohlfing, David J. Smyth, Esq., Joshua Ash Pearson, and H. Benedict Ripkee, Esq.

The Registration Commission operates under the Act of 1937, which inaugurated permanent registration in first class cities.

This Act went into effect shortly before a city-wide election in Philadelphia, and the Commissioners who were first appointed under it were compelled to use many inexperienced persons to complete the original records of registration for all qualified electors in the city. After this Commission had been operating for about a year and a half many charges were made of inefficiency and disfranchisement of voters.

In 1938, Governor George H. Earle appointed a Committee to investigate disfranchisement and the responsibility of the Registration Commission. A report adverse to the Commission was filed. That Commission was ousted by Governor Arthur H. James and the present Commission appointed, consisting of Theodore D. Starr, Sara S. McNeil, Charles Amodei, Francis S. Cantrell, Jr., and Harry V. Dougherty.

At the time the present Committee was appointed there were two other investigations pending; one referred to previously, by the United States Grand Jury, and another by the Committee to Investigate Campaign Expenditures under the Chairmanship of United States Senator Guy M. Gillette. The Senate Committee restricted itself in Philadelphia to an investigation of the Philadelphia Registration Commission. No conflict existed with either of these groups, inasmuch as the Grand Jury was confined to determining violation of Federal law through deprivation of the right to vote, and the Senate Committee had withdrawn its investigators immediately after the November election.

Pursuant to the purpose of its appointment, the Committee named Benjamin L. Long, as Chairman, and Dr. Charles C. Rohlfing, as Secretary. Dr. John Perry Horlacher of the University of Pennsylvania was appointed to direct the investigation. Mr. Josef Jaffe

was appointed counsel for the Committee.

The Committee conceived its purposes to be:

1. Investigation of specific charges made against the Registration Commission.

2. Fixing, as far as possible, the degree of responsibility in the case of any dereliction found.

3. General appraisal of the existing methods for administering a system of permanent registration.

4. Proposal of improvements to be made either through amendments to the law or administrative changes.

The Committee's report is presented in four main sections. The first section is concerned with the extent of illegal registrations in the voting lists and the responsibility of the Registration Commission for the condition found to exist.

Section two deals with the problem of removals, and the procedures available for handling this problem, the use made of these procedures by the Commission, and legislative and administrative proposals for a solution of the problem.

Section three analyzes the condition of the registration records in respect to authorizing assistance to voters.

Section four, while not purporting to be comprehensive and technical, is a general administrative survey. Major weaknesses in administrative organization and practice are discussed, their significance indicated, and appropriate remedies advanced.

The detailed work of the Committee was done by an investigating staff recruited from the senior students of the University of Pennsylvania and Temple University. The Committee is much indebted to these students for very able assistance. The Committee also acknowledges with pleasure the valuable assistance rendered by

the Pennsylvania Economy League, the Committee of Seventy, the Philadelphia Housing Authority, and the United States Committee to Investigate Campaign Expenditures.

I

ILLEGAL REGISTRATIONS IN THE VOTING LISTS

The theory of permanent registration contemplates that a qualified elector once enrolled should never again be obliged to register as a prerequisite to casting his ballot. If he moves from one election district to another, the law provides for the filing of a removal card and the transfer of his affidavit to a new district register. The exceptions occur when he removes from the city, or fails to exercise his voting franchise in four successive years.

In order to operate permanent registration effectively, the active records of registration should contain only the affidavits of fully qualified electors, so classified that they may vote in their proper election districts. This is a difficult task which entails the use of all the machinery provided in the Act to assist in its accomplishment. Systematic and forceful employment of all the available methods of cleansing the voting lists of illegal registrations must be made to efficiently administer permanent registration. Any letdown or neglect immediately causes an accumulation of improperly filed affidavits. Electors who should be legally stricken from the lists will have their affidavits remaining in the binders, making possible a charge of padded registration lists.

Nature of Charges

Many charges and complaints have been made. These resolve themselves into the following groups:

1. Failure to canvass, or to initiate strike-offs, resulting in many persons being registered from election districts in which they are ineligible as voters.

2. Failure to withdraw from the register the affidavits of all persons who have died.

3. Failure to process all removal cards filed, in sufficient time to permit the elector to vote in his new election district.

4. A general charge of mismanagement against the Registration Commission and its personnel.

It has been specifically charged that there are a great number of affidavits improperly in the binders, for the reasons cited. Various estimates of the extent of this "padding" have been made. The Federal Grand Jury, in its report, said that there were 50,000 illegal registrations. The United States Senate Investigating Committee noted the prevalence of a general belief that there were approximately 200,000 illegal registrations, and most recently the press reported that the Chairman of the Republican City Committee of Philadelphia estimated over 145,000 illegal registrations were among the records of the Commission. The Committee of Seventy alleged there were more than 100,000 improper registrations. The wide variance in these estimates clearly indicates the necessity of accurate determination of the number of registration affidavits improperly in the voting lists.

Significance of "Padded" Lists

The failure to maintain current records must eventually result in disfranchisement. An affidavit which is not filed in the district register of the particular district from which a qualified elector can legally vote, is for all practical purposes a lost affidavit.

Where the affidavit of a deceased elector, or of an elector whose right to vote is lost through legal disqualifications, remains in the binder, there is always the possibility of an illegal vote. And a voting list which contains a large number of improper affidavits constitutes an open invitation to fraud.

The overcrowding of binders, largely the result of failure to remove affidavits which do not belong there, is a principal cause of clerical and general filing error. The acuteness of this problem manifests itself on election day when thousands of voters, whose records are not found in the correct district binder, file their complaints. Where the affidavit is not located, many of these complainants resort to the election courts. Those electors who fail to complain, or whose complaints do not reach the stage of a court order, are disfranchised.

The extent of disfranchisement, therefore, varies with the degree of the Commission's failure to maintain current records. It may well be argued that where the number of illegal affidavits reaches great proportions the resultant clerical and filing error and election day "pile-up" may mean the loss of a number of votes sufficient to determine the winning or losing of a close election.

Election day complaints have been the cause of much re-

sentment, and as a matter of public policy in guarding the sanctity of the vote and educating the elector to the value of his franchise, confidence must be established in the integrity of permanent registration.

Extent of Illegal Registration

In view of the serious consequences that arise from "padded" registration lists, and because of the substantial variance in the estimates of the amount of "padding", it was imperative that guesses be replaced with facts.

The Committee therefore was faced with the problem of scientifically determining the number of registration affidavits improperly in the district binders. It is generally conceded that the vast majority are there because voters have moved and the records have not been corrected.

Fortunately, for the purposes of this study, the Committee was allowed access to information compiled under the sponsorship of the Philadelphia Housing Authority. This data indicated the duration of occupancy in each of the minor blocks of the City of Philadelphia and was thus a measure of the frequency of removals. Any analysis, short of investigating every registration on the books, must employ a sample. If the results are to be valid, and applicable to the total registrations, the sample must be representative of the variation in rates of removal in different sections of the city. Differences in these rates account for the fact that voting divisions are "overloaded" in varying degrees. A scientific sampling process, using duration of occupancy as a basis, was therefore designed. Investigators went to various sample blocks and obtained the necessary information to

complete a representative sample. The percentage of improper registrations then being ascertained for the sample, it was applied to the total 1940 registration of 1,092,924.¹.

The results of this study indicate 114,757 registration affidavits are improperly in the district binders. This figure, however, cannot be taken by itself to indicate with exactness the total of illegal affidavits in the voting lists. Because it is derived from a sampling process, it is subject to limits of error. These limits, however, can be precisely determined. Use of the appropriate statistical formula shows that the number of affidavits improperly in the binders is between 100,549 and 128,965, or between 9.2 and 11.8 per cent of the total registration. That the number falls within these limits can be stated with scientific assurance. Thus, for the first time reliable figures are made available regarding the extent of "padding" in the registration records.

Investigation of Specific Charges

A great part of the Committee's work involved investigating specific charges originating from three sources: complaints filed with the United States Senate Special Committee Investigating Campaign Expenditures, a series of articles by David Wittels published in the Philadelphia Record in October, 1940, and allegations made by the Committee of Seventy.

1. Senate Committee

The United States Senate Committee, headed by Senator Guy

1. Appendix I explains the technical process of sampling employed, and presents tables showing the make up of the sample.

M. Gillette, sent two investigators to Philadelphia for the purpose of obtaining information in reference to complaints of alleged frauds by the Philadelphia Registration Commission. In the course of this inquiry they interviewed a number of persons familiar with the problems of registration in Philadelphia, and also accepted complaints by citizens and organizations. The agents of the Senate Committee did not make a personal investigation, neither did they check any of the complaints filed with them. Affidavits of complaints, letters and other data were examined in Washington by a representative of the Governor's Committee. Notations were made as to a number of them for the purpose of verification.

Many blanket charges of fraud were made without any corroborating data, hence were impossible to confirm. There were many affidavits and photostatic copies of affidavits alleging the loss of removal cards filed by voters or complaints of the absence of registration affidavits from the proper district binders. There were communications addressed to the United States Senate Committee calling their attention to padded registrations in flop houses and hotels.

In all, sixteen representative types of complaints referred to the Senate Committee were investigated by representatives of the Governor's Committee. The great majority of the information supplied to the Senate Committee was found unreliable, nor was this unexpected as the Committee's Chief Investigator cautioned against use of any material without thorough investigation.

An allegation was made in one of the complaints that the Young Men's Christian Association of Philadelphia, 1421 Arch Street, had 221 persons registered, and that 66 of these were ineligible,

having removed. This charge was found to be substantially correct, although the figures vary in all checks made because of lapse in time between respective dates of inquiry. Investigation revealed that there were 359 electors registered from that address, whose affidavits appeared in the district binder. The manager was requested to verify the actual residence of these electors. This verification indicated that 143 of these electors were no longer residents of the hotel.¹. However, 64 of the 143 electors had voted in the general election of 1940 and as the actual date of removal is unknown, it may be presumed that these electors were resident at the date of the complaint, which was prior to the general election.

The charge was made that lodging houses situate 212, 218, 230, 250 and 254 N. 9th Street, in the 10th Ward, 3rd Division, were being operated by Albert Weingrad an employee of the Registration Commission and that there were many false registrations from those premises. A check was made of the ownership, operation and registration data as to all of these lodging houses.

The lodging house at 254 N. 9th Street is leased by Albert Weingrad an inspector of registration, although the business is and has been conducted by his father Alexander Weingrad for a period of over 45 years. The place is known as the Prospect Hotel. It is not located in the same election district in which Albert Weingrad resides. There were 43 electors registered from that address whose affidavits appeared in the district binder and seventeen of the 43 did not live there at the date of the inquiry, although twelve of the

1. Week of February 15, 1941.

seventeen electors had removed within six months of that date.

Further investigation disclosed that Albert Weingrad was not connected either directly or indirectly with any of the other lodging houses. Examination of the district binder disclosed that in all of these places there were a number of affidavits appearing although the elector had removed. It should be noted that these lodging houses are in what is known as the tenderloin district and there is a large turn-over of residence. For example, the lodging house at 250 N. 9th Street had 57 persons registered whose affidavits appeared in the binder and 22 of the 57 did not live at this address at the date of the inquiry, but of the 22 electors, sixteen had moved within six months prior to the time of investigation.

Another type of allegation inferred "juggling" of registration records on the part of Commission employees. It was contended that a number of strike-off petitions were filed against certain electors in the 20th Ward, 27th Division and that these petitions were granted on October 10, 1939. The complaints set forth that pursuant to the strike-offs, the affidavits of these electors were removed from the district binder and that a check of the binder by the complainants on August 16th, 1940 showed these affidavits were back in the district binder.

The names and addresses of eleven electors were given in the complaint. An investigation disclosed that three of the eleven had never been registered. There was no record of a strike-off petition ever having been filed against any of the named electors. Three of the eleven voted in the general election of 1940 from the election district recited in their respective registration affidavits.

A check was made of strike-off hearings held at or about the date alleged and the closest hearing date was on October 11, 1939 and on that night there were no petitions filed against any elector in the 20th Ward.

A third type of complaint recited that, although removal cards were filed, transfer of registration affidavits was never made. An affidavit was filed by Marie C. Kane, 5409 Akron Street, 23rd Ward, 16th Division, stating that she filed removal cards for herself and for John J. Kane and Regina R. Kane all of the same address. She further alleged that on October 21, 1940, their affidavits were not in the district binders. An examination of the registration lists indicated that her removal had been recorded on the original, duplicate and triplicate affidavits; that she voted on November 5, 1940, and her removal card was found to be in the file of completed removals. Both the other electors referred to voted on November 5, 1940, and proper changes of address were made on the original and triplicate affidavits, although the duplicate affidavits had not yet been changed. Both removal cards were found in the file.

The above examples are considered sufficient to show the degree of truth in the charges lodged with the Senate Committee. A complete list of all complaints investigated by the Governor's Committee appears in Appendix II.

2. Record Articles

A series of articles were written by special reporter David Wittels, and published in the Philadelphia Record prior to the general election of 1940. These articles charged irregularities in the administration of permanent registration by the Commission. A number

of allegations were made particularly with reference to improper registrations in apartment houses, hotels and flop houses, illegal registrations from vacant dwellings and lots, and "padded" registrations in that certain wards had more persons registered than there were adult persons according to the 1940 United States Census figures for those wards.

One article presented the names and addresses of a number of apartment houses and claimed that many electors registered from them no longer lived there. Representatives of this Committee checked the district binders for the respective divisions in which these apartment houses are located and, after determining the number of electors supposedly resident, made a personal check to verify actual residence.

It was alleged that 54 electors were registered from an apartment house at 4605 Chester Avenue and that 26 electors were no longer qualified either because of death or removal and that eighteen of the 26 still had their affidavits in the district binder. An investigation disclosed that this apartment house known as the Chester Plaza, had 45 electors whose affidavits appeared in the district binder and that 21 of the 45 had removed from the premises and were therefore improperly registered from that address.

It was alleged that 62 electors were registered from the place known as the Admiral Apartments at 237 S. 48th Street and that 27 of these electors were improperly listed due to removal and 22 of the 27 had their affidavits in the district binder. An investigation disclosed that 35 electors had moved from the apartment house and seventeen of the 35 electors were still improperly in the district binder.

Again, it was alleged that 100 electors were registered from an apartment house known as the Dorset Apartments, located at 4710 Locust Street and that 43 of these electors were improperly listed due to removal and that 40 of the 43 had their affidavits in the district binder. Investigation disclosed that 48 electors had moved from the apartment house and sixteen were still improperly in the district binder.

It appears that the figures recited in the charges are based on a comparison of street lists with actual residence. This is an inaccurate procedure as street lists are prepared prior to the final date for strike-offs and transfers of removal cards, and contain names which have actually been removed from the registers. Notwithstanding the inaccuracies found, the complaint of overloading of registrations from apartment houses is found to be a proper one as investigation of six apartment houses referred to in the article clearly indicates that there are a great many persons removed whose affidavits still appeared in the district binder.

Another article charged that many vacant lots and dwellings had persons improperly registered from those addresses. It was alleged that a house at 110 S. 20th Street was empty and that there were four electors registered from that address. Investigation disclosed that this dwelling has been vacant for three years and that there are four persons registered therefrom. Those registered are Louis Lantos, Martha Dennis, Willard Dennis, and Andrew R. Smiley.

The residence at 418 S. 24th Street was alleged to be empty with two electors said to be registered. An investigation disclosed that the premises are vacant and that two electors are still regis-

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tered in the district binder as living there, namely Joseph Donahue and James Stewart.

A vacant lot at 1503 Kater Street was alleged to have one voter registered from that address. An investigation disclosed that the building on that lot was demolished in 1936 and that Frank P. Donato is presently registered as living there. The building at 1824 Ludlow Street is alleged to be an empty store and dwelling with three electors registered therefrom. Investigation disclosed that there is no one in the district binder registered from that address, and that the persons previously so registered filed removal cards in September and October of 1940 to other addresses. Henry Nielson moved to 1034 Locust Street on August 3, 1940 and Max M. Chuse moved to 1526 Ranstead Street on September 1, 1940.

The dwelling at 1905 Naudain Street was alleged to be an empty house with one deceased person and one person who had removed being registered therefrom. Investigation disclosed that there is no one registered from that address. The location 1915 Naudain Street was alleged to be a vacant lot with one elector registered. Investigation disclosed that there is no one registered from that address.

The building located 739 E. Passyunk Avenue was alleged to be a warehouse with no one living there, but three persons registered therefrom. An investigation disclosed that there is no one in the district binder registered from that address, and that the four persons previously living there had all moved and filed removal cards in 1938, 1939 and 1940. Names of the persons on the list and having moved from there a long time prior to election are:

Garfield Epps - moved to 608 Randolph Street - 4/4/39
Charles Smith - moved to 912 S. 4th Street - 2/6/40
Tillie Gray - moved to 808 S. Randolph Street - 4/4/39
Joseph Gray - moved to 620 S. 20th Street - 7/14/38

The location 528 S. 11th Street was alleged to be an empty lot with two electors registered. An investigation disclosed that this is a barber shop and residence and that two persons are properly registered from that address, namely, William Kieth and John L. Norwood.

There were thirteen cases of alleged registrations from vacant lots and empty houses investigated by the Committee. Although the charges are unfounded in certain instances there are a number of cases of registrations from such places. A list of apartment houses, vacant lots and residences investigated by the Committee appears in Appendix II.

One article in the Record series charged that in eight wards of the City, more persons were registered than there were adults resident in those wards, according to the 1940 census figures. The figures given as representing the registration of these wards were checked and found to be in error. The correct figures as supplied by the Registration Commission appear in the table below where they may be compared with the figures used in the article.

Ward	Registration - <u>Comm. Figures</u>	Registration - <u>Record Figures</u>	Adult Census - <u>Record Figures</u>	Fall Vote <u>1940</u>
3	7091	7421	7198	5879
4	6729	7001	6682	4990
5	4704	5086	4780	3896
6	642	700	598	472
13	6747	7543	7142	5427
14	6216	7718	7031	4433
16	4494	4668	4501	3696
20	23531	25040	24660	18585

In an effort to check the census figures the Committee wrote to the United States Census Bureau and was advised that the figures of the 1940 census of adult population by wards were not yet available. Further inquiry as to whether the Bureau had made estimated figures available to any person was made. The reply stated that such figures were given to someone in Philadelphia in the fall of 1940, with the explicit qualification that the figures were not final and could not be reliably used.

The Committee is unable, in view of the circumstances noted, to verify this charge of registration in excess of adult population in certain wards of the city. The Committee's findings, however, cast some doubt upon the correctness of this allegation.

3. Committee of Seventy

In a letter dated July 5, 1939, the Committee of Seventy advised the present Registration Commission that it had conducted a canvass of 208,750 registered voters and found 28,348 persons whose affidavits were improperly in the binders. Lists showing the names and addresses of these persons had been transmitted to the former Commission. The Committee of Seventy advised the new Commission that, if unable to locate the lists in their files, copies of the originals would be gladly loaned them.

At hearings before this Committee, the Committee of Seventy charged that the Registration Commission had failed to take adequate measures to deal with the conditions disclosed by its canvass.¹

Representatives of the Committee of Seventy canvassed

1. Notes of Testimony, January 13 and 23, 1941.

297 divisions in the spring of 1939. Fifty-five of these same divisions were canvassed in the fall of 1939. In the fall of 1940 a third canvass was made. This covered 11 divisions, all of which were selected from the 297 originally canvassed. Two of the eleven had also been canvassed in the fall of 1939.

In each of these three canvasses, the stated procedure was to check the most recent street list against information obtained by house to house inquiry. The names of persons found to have removed or died were then checked against the district binders. This resulted in lists of cases where affidavits were improperly in the binders.

A fourth canvass of five divisions was made in December and January of 1940 and 1941, following the 1940 election. All five divisions were selected from the original 297. One of the five had been included in each of the preceding three canvasses. Three of the five were also included in the canvass made in the fall of 1939. This fourth canvass differed from the others in that the information obtained on the street was not checked against the district binders because they were impounded.

The original canvass in the spring of 1939 disclosed 28,348 voters removed or dead and a binder check revealed that the affidavits of these electors had not been transferred or cancelled.

To verify the results, it was deemed sufficient to spot check the divisions involved in the Committee of Seventy's investigation. For this purpose the five divisions covered in the fourth canvass were chosen. These were selected because they had been subject to the most recent check. Eliminated from the list of names for these divisions were those cases which presumably had been corrected

in the binders, as evidenced by the 1940 fall street lists.

To make the spot check adequate, it was decided to select additional divisions. Preferably, these should be divisions which the Committee of Seventy had covered in at least two canvasses. In accordance with this preference, the additional divisions were chosen from the fifty-five which had been canvassed in the fall of 1939. Four divisions were picked, each in a different ward.

The Committee of Seventy furnished lists of names and addresses for all nine divisions (distributed over six wards). Each list was checked in a house to house canvass on the street, and against the appropriate district binders. In the instances where no affidavits were found in the district binders, the names were checked against the files of the Registration Commission to ascertain when the affidavits had been removed, and for what reasons.

The original lists for the nine divisions (those forwarded to the Registration Commission as a result of the canvass made in the spring of 1939 and to which reference is made in the Committee of Seventy's letter to the Commission under date of July 5, 1939) contained a total of 1074 names. The lists furnished to the Governor's Committee contained a total of 554 names. The latter were lists resulting from the most recent canvasses made by the Committee of Seventy in each of the nine divisions. The difference of 520 therefore represents cases in which corrections had been made in the binders subsequent to the spring 1939 canvass. Since our investigation disclosed the status of the remaining 554 cases, it is possible to indicate what proportion of the original 1074 names were still improperly in the binders as of the November election in 1940.

A year and a half after notice to the Registration Commission listing 1074 instances of affidavits improperly in the district binders for these nine divisions, 275 or more than a fourth were still improperly in the binders. Not counted in this total are eighteen cases where persons had moved to another residence in the same division, although the address was not corrected on the affidavit. In the 5th Division of the 8th Ward, 44 per cent of the original list remained uncorrected. In no division of the nine checked was the percentage less than nine. The percentage for each division is shown in the following table.

<u>Ward</u>	<u>Division</u>	<u>Percentage</u>
2	1	16.0
3	6	09.1
4	6	09.9
7	3	10.5
8	1	29.8
8	5	43.8
8	6	40.8
8	7	28.3
30	17	38.7

As appears above, in the 297 divisions originally canvassed, the Committee of Seventy found 28,348 persons removed or dead for whom affidavits were incorrectly in the binders. As a result of the spot check made by the Governor's Committee it would appear that a minimum of approximately ten per cent of these affidavits were still in the binders at the time of the general election in 1940. The actual figure is probably higher than ten per cent.

In 202 of the 554 cases directly investigated by the Governor's Committee the affidavits were found to have been removed from the binders of the nine divisions involved. Of these 202 affidavits, 14.1 per cent (30) were taken from the binders during October 1940,

just prior to the election. Sixty-six or 32.2 per cent had been removed from the binders during October 1939 prior to the 1939 election. Fifty-four or 21.1 per cent had been removed just preceding the primary in August and September 1939. Thus over two-thirds of these 202 affidavits had been taken from the district binders in periods immediately prior to elections. To what extent the initiative of the political parties was responsible for their removal is not known.

Most of the affidavits were removed from the binders through the filing of removal cards. This was the case in 127 of the 202 affidavits. Strike-off petitions accounted for 68 affidavits removed and vital statistic reports for five. The remaining two appeared to be instances of re-registration; no other reason to account for the removal appeared in the records.

All told, 352 affidavits were found in the district binders. In 319 of these instances the person had moved or was dead. In seven cases no information was obtained from the street check. In the remaining 26 cases persons were found to be still resident at the addresses shown. Thus out of 554 names listed by the Committee of Seventy and alleged to be instances of voters whose affidavits did not belong in the binders, these lists were in error to the extent of 26 voters or 4.7 per cent of the total.

Commission's Reply to Charges

The nature of particular charges and the extent to which they were verified has been detailed. To complete the record, the Commission was invited to appear before the Committee and make whatever explanation it cared to. When interrogated regarding the steps

taken to check the information submitted by the Committee of Seventy, Mr. Cantrell explained that, granted the lists submitted were substantially correct, the Registration Commission could not in July of 1939 have directed their employees to check them because of the large amount of work they found waiting when they assumed office. With regard to the 1940 list submitted by the Committee of Seventy, he said that the Registration Commission intended to start work on it on November 9th, but that the Federal Grand Jury proceeding, with the impounding of the records, intervened on November 7th, making it impossible.¹.

Mr. Starr in further answer said that he was notified by the Committee of Seventy of the list of 279 divisions which was originally sent to the old Registration Commission. He was advised by Mr. Dooley, then chief inspector, that a spot check had been made of these lists and they were found to be so wrong that no further action was taken.².

Mr. Starr further contended that the information was not checked because most of it was based on the 1938 and 1939 street lists, and that street lists are admittedly inaccurate because they are prepared prior to the final day for filing and hearing strike-off petitions, and do not contain all changes in removals. He said that the Committee of Seventy did not give them specific information in the way of names and addresses, but referred back to the original lists submitted to the old Registration Commission.³.

1. Notes of Testimony for April 14, 1941, pp. 20-21.
2. " " " " April 14, 1941, pp. 15-17, 22.
3. " " " " April 14, 1941, pp. 1, 2, 6-8.

They did check certain of the 1940 street lists marked by the Committee of Seventy and found a slight percentage of error on the part of the Committee of Seventy. A summary of this check was sent in letter form to the Governor's Committee. Chairman Starr did not recollect getting any notes or lists from the Committee of Seventy of a second canvass of fifty-five divisions, or a third canvass of eleven divisions.¹ An examination of the exhibits offered in evidence by the Committee of Seventy indicates that lists given to the Registration Commission covering the second and third canvasses did not contain names and addresses, but referred to wards and divisions only.

In answer to the charge that employees of the Commission did not do sufficient canvassing, Mr. Starr said that in 1940, the Registration Commission checked 138,311 registrations for residence; that as a result of this check there were 17,295 strike-off petitions initiated by the inspectors' department; 3,141 were stricken under Section 32 - the mail check, and the balance of these petitions were disposed of under Section 33 - canvass.²

In a statement submitted to the Committee by the Commission, figures were presented as to changes made on registration records during 1940. They alleged that in that year 63,215 affidavits were cancelled; 49,866 represented strike-offs and cancellations under Sections 32 and 33 of the Act; 13,349 represented cancellations on death certificates.

1. Notes of Testimony for April 14, 1941, pp. 22,23.

2. " " " " April 14, 1941, p. 27;
Jan. 30, 1941, pp. 60,61.

The Commission was specifically questioned as to when the Y.M.C.A. at 1421 Arch Street was last canvassed. Mr. Starr, answering for the Commission, said that it was canvassed twice in the spring of 1940, and prior to the general election in September 1940. The inspectors discovered that instead of too many persons listed as residing at the Y.M.C.A., there were 21 additional residents who had a right to be registered from that address. He further stated that in the spring and fall of 1940 the Committee of Seventy filed petitions for strike-off against certain electors registered from the Y.M.C.A., and at the hearings all of the parties appeared and swore that they lived there. In one instance where sixteen of these residents had been stricken from the list, seven of the sixteen subsequently returned and were restored. On February 18, 1941, presumably as a result of the mail check up, 101 registrations were cancelled from that address.¹.

The Commission's Responsibility

The Committee's investigation proves that charges of an extensive number of illegal registrations in the voting lists are by no means unfounded. In view of the number of voters moving annually, there will always be a minimum percentage of registration affidavits improperly in the binders under the most efficient administration. This limit of tolerance, however, should not exceed three to five per cent. An actual percentage of 9.2 to 11.8 indicates culpable laxity. No explanation offered by the Commission constitutes a justification of this condition.

1. Notes of Testimony for April 14, 1941, pp. 36-37.

When, through the efforts of the Committee of Seventy, specific instances of illegal registrations in particular divisions were called to the Commission's attention, they apparently were not taken seriously. The claim that the lists furnished by the Committee of Seventy were too inaccurate to bother with is proved untrue. On the contrary, they were substantially correct. A year and a half after notice to the Commission of 28,348 persons removed or dead whose affidavits were incorrectly in the binders, a minimum of ten per cent remained unrectified. This can only be construed as evidence of negligence.

The Committee notes that whatever factors prevented the Registration Commission from immediately acting to correct the conditions drawn to their attention when they took office, that a year and a half had intervened since that time - a period during which three elections have occurred. This is ample time to have fully corrected the conditions.

Regarding the claim that the Committee of Seventy's information was based solely on street lists, this is true only in respect to the five divisions recanvassed after the 1940 election. Information from all prior canvasses was based upon a check of the district binders. Binders were not checked in the 1940 canvass because they were impounded.

Whether the Committee of Seventy furnished lists of specific names and addresses in connection with each canvass it made seems immaterial. The lists showing names and addresses, resulting from the original canvass of 297 divisions, were transmitted to the Commission. The Committee of Seventy offered to supply duplicates if

these lists could not be located.

In light of all of the facts it must be concluded that the Commission substantially failed to discharge its duty to maintain current voting lists. The Committee finds no evidence, however, that this failure actually resulted in fraud of any kind.

II

THE PROBLEM OF REMOVALS

In the City of Philadelphia over one quarter of a million persons move annually.¹ Probably 100,000 of these persons are electors. It is the Registration Commission's function, employing the methods made available by the Act, to effect transfer of the registration affidavits of these electors from the old to the new address. Where any of these persons moved from the city it is necessary to effect the cancellation of the affidavit. The facts set forth in Section I are eloquent of the magnitude of the administrative problem created by the removal of voters.

Inasmuch as this great group of voters do not move in proportionate numbers throughout the year, it can be appreciated how difficult is the task of constantly keeping track of them, and transferring or cancelling their cards as the case may be. This difficulty is greatly aggravated by the fact that the removal problem has largely been left to be handled at its source by the political parties. As a result the Commission receives approximately 50,000 removal cards about 35 to 40 days prior to an election, and must process these cards by the Saturday prior to election.

Methods of Handling Removal Problem

The law provides that any person moving from one election district to another must file a removal card at least 30 days prior to the election, certifying the change from the old to the new address,

1. Real Property and Low Income Housing Survey, Philadelphia Housing Authority, Philadelphia, Pa., 1939, p. 34.

and his signature must be witnessed by two qualified electors in the new division. Any person moving in the same division must file a card with similar information at least ten days prior to the election.

When an elector moves from his election district he is, of course, no longer eligible to vote from that address. During the period preceding political campaigns, it is the practice of party workers to canvass their respective election districts and upon ascertaining a removal, a strike-off petition is filed against the elector who has moved, or is otherwise no longer qualified as an elector.

Investigations of particular districts are also made by registration investigators for the purpose of initiating strike-off proceedings against electors who are no longer qualified because of removal, death, or other reasons set forth in the Act. The law further provides that a general canvass can be made at any time and allows for as many as two investigators for every division in the city for the purpose of this canvass.

Sample mail check-ups of election districts are also provided for in the Act, as well as the mandatory city-wide check-up every four years. Postcards are sent and if returned as undeliverable, action is taken to cancel the registration.

Difficulties in Processing Removal Cards

During 1940 more than 130,000 removal cards were filed with the Commission. These cards have been a prolific source of error in the Commission office. This is strikingly indicated in the examination of complaints and court orders where most errors are found to be attributable to faulty removal cards. The mistakes are so

numerous that a special file was created called "can't locate" file.

Each removal card has in the upper left hand corner the letters "O" referring to original, "D" duplicate, and "T" triplicate. Each letter is checked as the appropriate change is made on the affidavit. It may happen that the triplicate, original or sometimes the duplicate is not in its proper place. This occurs when a triplicate is used as a substitute for the original in the district binder, or where a party has moved in between the time he lived at the old address set forth on the removal card and his present address, and the change had previously been made to his intermediate address.

Some of the reasons for the many errors are mistakes in ward and division of either the old or new address; reversing of address on the removal card, placing the new address where the old address should be; filing of removal cards instead of registering; use of marriage names in removal cards where the original affidavit was filed under the person's "single" name.¹.

The Commission contends that all these errors could be corrected by the Commission prior to election, and all of the cards properly filed with the corresponding changes made in the binders, if removal cards were to come into the office at regular intervals throughout the year, instead of being "dumped" immediately prior to the last day for filing. They contend that in August of 1940 the district binders were accurate; that between September 5th and October 5th, 59,000 removal cards were filed, and of this number more than 41,000 were received between October 2nd and October 5th.². This

1. Notes of Testimony for March 21, 1941, pp. 41-44.
2. Thirty-fifth Annual Report of the Registration Commission for the City of Philadelphia, December 31, 1940, p. 4.

meant that more than 41,000 affidavits had to be changed before the general election on November 5th, or practically speaking by the 1st of November, as the binders were delivered to the County Commissioners on that day.

The Commissioners further contend that all of these changes were made, and that the district binders were up to date on election day, but that it was physically impossible to have the duplicate register current and all removal cards filed by election day. As a further result of this flood of work there is an inevitable amount of clerical and general filing error.

The Federal Grand Jury commented on the fact that the "can't locate" file was being overworked by the Commission without any real justification. The law provides that upon receipt of a removal card the signature thereon must be checked with the signature on the elector's affidavit, and if it appears authentic the transfer is to be made. Under present practice the Registration Commission employees will not effect a transfer where there is a slight variation in the way the signature is made, or in date of birth, or where there is any other existing difference between the information on the removal card and on the affidavit. These cards all go into the "can't locate" file.

Strict attention to detail and careful filing would largely eliminate the need for such a file. It generally means that an affidavit is mislaid or is in the wrong place. The only bona fide use for a "can't locate" file is where a person files a removal card without ever having registered, or uses a marriage name, or has his name legally changed, or varies the spelling of his name at different

times. Otherwise, competence in filing and search should locate the affidavits.

Office Removal Cards

Attention is called to the use of an office removal card. The Commission permits an elector to appear at its office and execute a blue form of removal card which does not have to be witnessed by two electors in the new division. It is questionable whether the use of this form is permissible under the present Act. There can be no doubt that this practice is desirable as a convenience to the electorate. Questions have been raised as to the manner of its use. An inspection of these cards by the Committee indicates that electors of both parties made equal use of this form of removal card. There was no official action ever taken authorizing its use, and it appears that neither the political parties nor the general public were ever notified of this right to execute a removal card at the Commission's office.

A serious flaw in the use of these cards is the omission of a time stamp. At present they are hand dated by the employee who accepts the card.¹ It is strongly urged that these cards be time stamped after execution to insure accuracy of filing time.

Improvements in Removal Card Procedure

It is advisable that the Act be amended so that removal cards must be in the office of the Commission not later than 50 days

1. Notes of Testimony for April 14, 1941, p. 34.

prior to all primary and general elections, and not later than 40 days prior to a municipal election.

A further practical suggestion would be to inaugurate a system of education by letter or through the press encouraging the filing of removal cards throughout the year, as one means of diminishing the last minute flood. The Commission should not complain of this flood and do nothing to mitigate it.

Many complaints have arisen by reason of the fact that removal cards are collected by party workers, and either held until after the dead line or held out entirely. An amendment therefore is proposed making it a criminal offense to withhold or destroy a removal card.

It is further recommended that each removal card have a stub attached to it, which shall be returned to the voter and act as a receipt; both the removal card and the stub to be stamped with a serial number for the purpose of identification.¹.

Charges of Mishandling Removal Cards

Certain specific charges were made against the Commission at a public hearing before the House Elections Committee upon House Bill 636 on May 9, 1941. The Governor's Committee requested an answer to these charges and a memorandum was submitted by the Commission. The allegation made was that on April 26, 1940, approximately 2300 cards were mailed notifying electors that they were eligible to vote in the November 1940 election, and that on October 29, 1940, these

1. This is discussed more fully in Section IV.

same electors received letters from the Commission that they could not vote at the November election because notice of 60 days was not given.

The Commission set forth in its reply that prior to the spring primary of 1940 the Commission received 2,596 removal cards which were invalid to enable the electors to vote at the primary, either because of insufficient residence in a division, or because of late filing. Letters were sent to each of these persons notifying them of this fact. A complete alphabetical list of these electors was prepared at that time to enable the Commission to accurately dispose of complaints received on election day, and for the information of the election court. After the primary the removal cards referred to were acted upon and cards were then sent out to the electors notifying them of the transfer of their registration.

Before the November election there were received approximately 2,460 removal cards which were invalid to enable the electors to vote at the November election, either because of insufficient residence in the division, or because of late filing. Notices were sent to those electors advising them of their ineligibility.

It is specifically denied that the electors who received notification of their ineligibility to vote at the November election, had any relation to those electors who had been notified after the primary that they were eligible to vote. Any duplication of notice would be due to the fact that an elector had again changed his address and sent into the Commission a new removal card. A complete list of electors whose removal notices were defective for purposes of the November election is in the possession of the Commission.

Strike-Off Petitions - Extent

When a strike-off petition is filed in triplicate in the office of the Registration Commission it is accepted by the Inspector of Registration who checks the receipt in a receiving book. The district binder is then checked to determine whether or not the party to be stricken still has his affidavit in the register. If the affidavit is not in the binder, then the petition is filed separately in the N. I. B. file (not in binder). Where the affidavit is in the district binder a time for hearing is fixed and noted on the petition and service is made by the inspector at the residence set forth in the petition. The party certifying to the petition is notified of the time and place for the hearing. A copy of this petition is also served on the City Committee of the elector's political party. At the time fixed for strike-off hearings the Commissioners hear the evidence and decide whether or not the petition should be granted.

There were 75,229 strike-off petitions filed during 1940. Of this number 15,296 had to go into the "N. I. B." file. Some 60,000 petitions were heard; 49,866 were granted and 10,067 were refused.¹

Failure to Notify Petitioner

The Committee made a notation of every instance in which strike-off hearings were fixed and the petitions filed were refused because of the absence of the petitioner. Letters were sent to the petitioners who filed these affidavits and they were requested to advise whether they were ever notified of a hearing to be held, and

1. Thirty-fifth Annual Report of the Registration Commission for the City of Philadelphia, December 31, 1940, p. 9.

if they were notified, why they were not present. The answers received indicate that all persons were actually served with notice to appear, but that in most cases, for personal reasons, they were unable to appear at the hearing.

Charges of Mishandling Strike-Offs

At the public hearing before the House Elections Committee upon House Bill 636, on May 9, 1941, the charge was made that 21,000 strike-off petitions filed between August 17th and October 23rd, 1939, were still undisposed of. The Commission specifically denied this allegation and presented information to the effect that 33,435 petitions were filed during that period in 1939; that of this number 9,709 were not heard prior to the November election of 1939; that the failure to have hearings on these petitions was due to the impossibility of proper service and a late filing date, and that all of these petitions were disposed of at hearings held on January 16th and January 18th, 1940.

Improvements in Strike-Off Procedure

Complaints have been made concerning the manner in which strike-off hearings are conducted. The hearing room is always crowded and electors are often required to wait hours before a hearing is held on their respective petitions. It is recommended that hearings be fixed in a planned manner. A system of scheduling hearings so as to reduce the inconvenience to electors can and should be devised.

To speed up the disposition of strike-off contests, an amendment to the Act is suggested permitting a hearing by two members

of the Commission, one from each political party. It will thus be possible for hearings to be held simultaneously in two hearing rooms.

It is further recommended that the Commissioners bear down on the obnoxious practice of certain political workers filing strike-off petitions for the sole purpose of harassing or annoying voters. This can be done by preferring perjury charges against these petitioners to the District Attorney's office.

It is strongly urged that the rules of law and procedure followed at strike-off hearings be formalized in opinions filed by the Commission or its counsel. Many points raised at these hearings, although similar to cases previously decided one way, are sometimes otherwise adjudicated. Commissioners sometimes disagree on questions of procedure as in the case of a removal card filed by an elector after a strike-off petition is granted against him. In order to assure uniformity, written opinions are desirable. This would also be helpful where a new practice is instituted which is not entirely clear under the Permanent Registration Act.

Use of Utility Reports and Lodging House Registers

Considerable emphasis has been placed by the Committee of Seventy on the fact that the Commission has refused to avail itself of the utility reports provided for in the Act. They contend that the use of this information, which must be supplied by utilities at the request of the Commission, would be invaluable in keeping the records current.

The Commissioners were interrogated as to the use made of these reports. It was stated that the Registration Commission does not

request or use the reports of removals from public service companies, moving concerns, or rental agents. The reason given is that the previous Registration Commission received 4,000 names a month from utility concerns and found that their use was impractical. There are always duplications, and in addition a great amount of work was involved on the part of map readers who had to locate the particular ward and division for each of the 4,000 addresses. It was then necessary to examine the binder and ascertain if the party was registered. The utility reports were considered unsatisfactory because of the great error in spelling of names, particularly in the first and middle names, or in the use of initials. A preliminary examination often disclosed that the persons appearing on the utility reports were not in the binders.

The only occasion in which they considered the use of utility information practical was in the case of wholesale removals where entire election districts were vacated to make way for a housing project. In those instances the names and new addresses of electors were requested from the utility companies and removal cards mailed to the new address. Even in these cases, it was contended, the information received was not reliable and many communications sent to the electors were returned by the post office marked "not at".¹

It would appear that in spite of all this objection raised by the Commission, utility reports could be very helpful. The Chief Clerk of the Montgomery County Registration Commission advised a representative of this Committee that extensive use was made of utility

1. Notes of Testimony, January 30, 1941, p. 44 ff.

reports, furnished by one particular electric company. The Philadelphia Registration Commission could make similar use of reports furnished by any one company, whose reports were found to be most reliable after a sufficient term of experience. The greatest advantage accruing from the constant use of utility reports would be in a more regular flow of removal cards. The Commission's judgment that their use is impractical may reflect incompetent personnel and poor system at the time they were tried out.

An amendment to the Permanent Registration Act is suggested which would make it mandatory for each licensee of a hotel, tenement or lodging house to report annually and at such other times as the Commission may request, the names of all persons who have resided in any hotel, tenement or lodging house owned and operated by such licensee for a period of two calendar months or more, and to designate in such report whether or not such persons have removed and the address to which they have removed, if known to the licensee.

This amendment would further require the maintenance on the premises of a Register, available for public inspection, containing the names of every adult person residing in the hotel, tenement or lodging house, who has resided therein for a period of two months or more. The effective use of these new facilities would cut down considerably the work of the inspection department, and would, if constantly used, dispose of the complaints made as to padding of registration lists in hotels, tenements and lodging houses.

Cancellation for Failure to Vote

Still another avenue of attack on the problem of removals

is more frequent employment of cancellation of registration for failure to vote. Under the Act cancellation takes place if the elector has not voted in a four year period. The Committee recommends an amendment to reduce this period to two years. This will materially aid in cleansing the voting lists.

Change of Party

The vital work of handling removal cards and strike-off petitions in periods prior to elections is unnecessarily impeded by having to process change of party cards during these rush periods. Since no purpose is served by effecting change of party on the registration records between primaries and elections, it is recommended that this be eliminated.

Solution of Removal Problem

The large number of removal cards filed with the Commission, the filing of strike-off petitions in similar magnitude, the fact that these removal cards and strike-off petitions tend to reach the Commission's offices in a short period prior to elections and must be disposed of before election day, the difficulties and errors which attend the effort to handle this peak load in a short space of time, all abundantly testify to the necessity of substantially reducing this enormous peak of work.

Removal cards and strike-off petitions originate primarily because registered electors have moved. The problem of removals will not be solved by the Registration Commission until effective steps are taken to reduce the number of potential cases which occasion

filing of removal cards or strike-off petitions by party workers in brief periods prior to elections. The Commission is not without means to attack this problem and greatly reduce the number of removed electors whose change of residence has not been effected in the voting lists, and who are the cause of the last minute activity in handling removal notices and strike-off petitions. Planned systematic canvass of the entire city by the inspection department, if vigorously prosecuted throughout the whole year, would unquestionably reduce the pool of removed voters. Numerous other methods have already been discussed. If these were accompanied by a city-wide mail check made at least annually, there is every likelihood that the number of removal notices and strike-off petitions to be disposed of in periods just before election would be greatly reduced. The Committee strongly recommends that the Act be amended to make annual mail check-ups mandatory.

It is apparent that failure to effect changes of address in the registration records continuously and substantially throughout the year is the prime cause for having to effect such changes in a period of time so short that many voters are necessarily disfranchised because of errors on their own part or on the part of the Commission's employees.

III

THE ASSISTANCE RECORD ON REGISTRATION AFFIDAVITS

Any elector is entitled to assistance in casting his ballot on election day if his registration affidavit sets forth that he is unable by reason of illiteracy to read the names on the ballot or on the voting machine labels, or if he has a physical disability which will render him unable to see or mark the ballots or operate the voting machine, or to enter the voting compartment without assistance. Declaration of the need for assistance and a statement of the exact nature of the disability must appear on the affidavit.

In the 1938 investigation of the Registration Commission, considerable attention was paid to the condition of registration affidavits in respect to the assistance record. The report disclosed a substantial number of errors in these records. The present Committee was principally interested in ascertaining what had been done to correct this situation. Its findings are briefly set forth in this section.

Nature of Errors

The question on the affidavit with regard to assistance is ambiguously worded, so that it is difficult to decide at a glance whether the question should be answered "yes" or "no". Because of the ambiguity a number of affidavits have the "yes" block checked where a person does not require assistance. These affidavits erroneously checked were executed at the original registration in 1937 by tem-

porary registrars in the various election districts throughout the city. When it became generally understood that the "no" block should have been checked where a person does not require assistance, many registrars attempted to cure this error by checking the "no" block, so that many affidavits have both blocks marked. Another common mistake occurs where the "no" block was checked by the temporary registrar, who considered it a proper notation and then set forth a reason for assistance.

Extent of Errors

On information obtained from the United States Senatorial Investigating Committee, a check was made of two divisions alleged to be particularly bad with regard to assistance records. These were the 4th Division of the 39th Ward, and the 12th Division of the 36th Ward.

In the 4th Division of the 39th Ward there were 324 requests for assistance. Of this number 183 were improperly set forth; 129 of the 183 were mistakes of a technical nature, indicating a misunderstanding on the part of the Registrar as to the correct block which had to be checked. There were 54 cases, however, where the reason given for assistance was not a lawful one within the meaning of the Act, such as "don't understand machine" - "can't operate machine" - "can't read ballot".

In the 12th Division of the 36th Ward there were 101 requests for assistance. Of the 101 requests for assistance 67 were improperly set forth; 49 of these were technical in nature and eighteen gave a reason not legal under the Act.

The Committee of Seventy made certain allegations as to defective assistance affidavits in several divisions of the City of Philadelphia, and these also were checked with the following results.

In the 18th Ward, 3rd Division there were 33 defective affidavits, 20 of them being of a technical nature. In the 19th Ward, 7th Division there were 43 defective affidavits, 41 being of a technical nature. In 35 cases there was no check whatsoever. In the 14th Ward, 8th Division there were 101 defective affidavits, 92 of which were of a technical nature. In the 2nd Ward, 3rd Division there were 153 defective affidavits of which 150 were of a technical nature. In the 2nd Division of the 33rd Ward there were 452 defective affidavits, all of which were of a technical nature; 398 of these having no check whatsoever.

In addition to the district binders examined on complaints culled from the records of the United States Senatorial Committee and the Committee of Seventy, certain other district binders were selected at random and examined for error in assistance information. It may be stated that district binders generally are incomplete and inaccurate as to assistance data, and that the reasons given for assistance in many instances, although legitimately given, are illegal because not correctly stated for the purpose of the Act.

Failure to Rectify Errors

From these findings, it appears that the Commission has not effectively taken steps to correct extensive errors in the assistance record on registration affidavits although apprised of this condition through a report made more than two years ago. During the tenure of

the present Commission all affidavits were checked to correct mistakes in naturalization data. This data appears on the affidavit form directly above the assistance record. The latter could readily have been checked at the same time. Failure to use this opportunity of killing two birds with practically the same stone is a striking example of the lack of administrative planning noted in Section IV.

Although errors of the sort described as technical may entail no serious consequences for the integrity of voting, this is no excuse for not correcting the record. Where the reason given for assistance is not a legal reason, then the exercise of this right in the affidavit is improper and constitutes illegal assistance. Inasmuch as most persons who request assistance receive it at the hands of a party worker, it need hardly be noted that an abuse of the privilege leads to a party control of the assisted vote.

Cancellation of Right to Assistance

A check also was made of certain assistance records in the County Commissioner's office. At the time of voting the person who assists the voter must sign a sheet which has on it the name of the party being assisted and the reason for the assistance, and the signature of the party giving the assistance. An examination of several divisions shows that many voters entitled to assistance did not take it. For example, a check of the records for the 39th Ward, 4th Division indicates that although 324 persons were entitled to assistance, only 110 availed themselves of this right. The apparent explanation for this condition is the fact that 1940 was a presidential year, and many persons who were willing to be ignorant or disabled for three

years wanted to exercise their own voting right for the election of the President.

Section 30 (f) of the Act imposes upon the Commission the duty to cancel the assistance entry where an elector has voted without assistance. Although the spot-check made by the Committee indicates there may be many instances where this provision should be applied, there is no evidence of any action by the Commission.

IV

ADMINISTRATION OF THE PERMANENT REGISTRATION SYSTEM

Essentials of Effective Administration

The Registration Commission like any business concern has a job to accomplish. It must register voters. In doing this it must maintain accurate records for more than a million registrants. It must maintain these records in such a manner as to make available instantly information with respect to any registered voter. It must keep these records current, eliminating from the lists records of voters who have moved or died. It must do its job so effectively as to be able to deliver at elections the registration records free of all taint of error and padding.

This is no small administrative task. While it is not overwhelming, if it is to be accomplished with efficiency, essential considerations of successful administration must be observed.

Two primary requisites must be met in order to carry out successfully any considerable undertaking. Persons performing the work must be qualified and fully competent for the tasks to which they are assigned. But competent personnel by itself can produce no results. That personnel must be welded into a co-ordinated, smoothly functioning whole. This can be done only through proper organization. Hence, to qualified personnel must be added a scheme of organization which will energize and co-ordinate the efforts of the workers.

The nature of a system of organization which will produce these results is no secret. It has been employed in the organization

of armies virtually throughout history. It is implicit in all of modern business organizations. Its essential characteristic is that every worker is effectively related to every other worker through relationships of authority and control based upon unity of command.

At the bottom of the organization this means that each worker will be controlled solely by one superior, who in turn will be fully accountable for the work of those under his supervision. At the top of the organization it means that all supervising officers will be subject to the single control of a directing head, who is fully responsible for the performance of the entire organization.

These are the essential administrative considerations which must underlie the functioning of the Registration Commission if its work is to be accomplished economically and well. Employees competent to perform the duties given them must be selected. You cannot make a silk purse unless silk is used. This does not mean, however, that the hiring of able workers is sufficient of itself. Only confusion would result from assembling one hundred competent employees, providing them with copies of the Registration Law, and instructing them to register the voters of Philadelphia. But if competent employees are effectively organized under the control of a single administrative manager, who is held responsible for executing the policy of the law, efficient results may be confidently expected.

To what extent does the present administrative structure of the Registration Commission meet these requirements? The findings presented in this section provide an answer to this question.

Administrative Responsibility and Supervision

Under the Act, administrative responsibility is vested in the Registration Commission as a body. The administrative functions of this plural executive are comprehended under two particular provisions. Section 4 authorizes the Commission to make regulations for the performance of the duties imposed under the Act; Section 5 vests the power of appointment in the Commission. No other provisions relate specifically to the location and definition of administrative responsibility.

The effect of these legislative directions is to create five general managers to conduct the business of registering voters in Philadelphia. Each of the five general managers has authority under the law co-equal to all the others. While an arrangement of this kind is legally possible, it is impossible as a practical matter. This may be appreciated by imagining a parallel arrangement for the conduct of any other important and extensive enterprise whether public or private. It is, for example, as practicable as the management of the administrative affairs of the Commonwealth by a Board of five Governors.

The actual administrative arrangement likely to prevail under a legal set-up of this kind will take the form of one of three alternatives. First, the chairman of the Commission, without legal authority, becomes the de facto chief of the organization. This is most likely to happen when the chairman is a person of vigor and administrative capacity. A second practical possibility is the formal division of administrative responsibilities among the members of the Commission. This results in a headless organization without unified

direction and single responsibility. The third alternative, commonly encountered where the device of a plural executive is employed, is confusion in administrative responsibility and supervision. This may be accompanied by some degree of centralization of control in the chairman, but of an informal and uncertain character. There may also be some degree of division of responsibility among the members of the Commission, also informal in nature and, therefore, uncertain. The net result is that no one is clearly charged with the single responsibility for seeing that the law is efficiently administered. All have a finger in the pie, and where accountability begins and where it ends, in respect to specific performance of functions, no one exactly knows. Any deficiencies are chargeable to no one in particular.

Where the actual administrative arrangement under a five man commission takes the form of the third alternative, the worst possible result for effective administration is realized. More nearly than either of the other two, this third alternative represents the existing condition in the Registration Commission. The notes of testimony given in hearings before the Committee show a confused picture of administrative responsibility and supervision.

The Chairman of the Commission stated that the tabulating division was his own particular charge, adding "but I do go to all the other departments". Some slight degree of centralized responsibility is indicated in the statement of the Chairman that "most of the questions that come up, come up through me to the rest of the Commission". Any question of importance, it was indicated, is referred to the Commission to be voted upon. The implication is that certain decisions are taken by the Chairman on his own responsibility

where the matters are deemed of insufficient importance for decision by the entire Commission.¹.

The Committee sought to determine what administrative responsibilities were in fact discharged by the other members of the Commission. Questions addressed to the Chairman of the Commission elicited replies indicating that Commissioner Cantrell handles legal questions arising from time to time. There was no indication of the manner in which this function was shared with the Commission's attorney, who is designated by the Act as the legal advisor of the Commission. Commissioner McNeil was stated to have entire charge of all filing with the exception of the binders in which the original voting affidavits are filed. The only specification following this statement was that Commissioner McNeil was in charge of the girls who filed duplicate affidavits, a specification followed by the further comment that she was in "charge of all filing practically in the whole place".

It is apparent that this allocation of responsibility is uncertain. In discussing the specific responsibilities of commissioners, the Chairman stated that Commissioner Amodei is the Secretary of the Commission. This is the only reference made to this Commissioner.

It may be noted in passing that the office of Secretary is nominal. Commissioner Dougherty was not mentioned at all during the Chairman's explanation of the duties of the Commissioners. The necessary inference is obvious.².

1. Notes of Testimony, April 14, 1941, p. 57.

2. For statements on duties of Commissioners see Notes of Testimony for April 14, 1941, p. 57 ff.

Rather than retaining direct administrative responsibility itself under any of the alternatives discussed above, the Commission might delegate actual responsibility to the Chief Clerk, who would exercise his authority subject to the direction of the Commission. This is done in administering permanent registration in Montgomery County under legal provisions substantially similar to those of the Philadelphia Permanent Registration Act. The Chief Clerk has complete administrative control and is in no wise interfered with by the County Commissioners in his day by day conduct of the registration office. The County Commissioners, who are by law vested with entire legal authority in the administration of permanent registration, confine themselves as a matter of practice to the determination of policy and the taking of actions required to be done by them to be legal.

The testimony presented at hearings before the Committee indicates that the Chief Clerk in the Philadelphia Registration Office has not been given similar responsibility. The law does not exactly define the administrative duties of the Chief Clerk. These duties were stated by the Chairman of the Commission to involve general supervision of the employees. The meaning of this statement may be interpreted by reference to the specific duties of the Chief Clerk. He checks on whether employees report to work, and is supposed to report to the Chairman of the Commission on the value of the employees, and whether they apply themselves to their jobs.

Questioned particularly about the authority of the Chief Clerk over employees, the Chairman of the Commission stated that the Chief Clerk has no authority to hire or fire. Asked, in view of this statement, just what authority the Chief Clerk had to maintain disci-

pline, the Chairman replied: "He has authority to keep discipline; he reports to the Commission through me generally, or any of the others that are there, dereliction on the part of any of the employees."

The testimony indicates that the Chief Clerk is not responsible for setting up the administrative procedure to govern the office routine, although he is to see that established procedure is carried out.

The testimony further shows that the Chief Clerk has certain exclusive responsibilities. He makes up the pay roll, prepares the inventory of supplies at the end of the year, orders supplies, and is responsible for getting out the district election registers at election time.¹.

These duties of the Chief Clerk, when viewed in the light of information given the Committee with respect to the administrative responsibilities of the Commissioners themselves, point to the conclusion that the Chief Clerk is in fact something of an office manager in the strict sense, rather than the administrative director of the entire organization.

The employees are, of course, directly supervised by the heads of sections in which they work. Such supervision, however, is not in a clearly defined hierarchy of authority, and in some instances appears to be ineffective because any power to discipline is lacking.

It is thus apparent that the employees of the Commission are subject to direct instructions from at least three different levels

1. For statements detailing the duties of the Chief Clerk, see Notes of Testimony for April 14, 1941, pp. 62, 63.

of supervision, their immediate supervisors, the Chief Clerk, and the Commissioners (more than one of whom may undertake to direct the work of particular employees). Unity of command, and clearly defined responsibility are lacking.

To cure the basic weakness revealed in this analysis, the Committee recommends amending the law to make the Chairman of the Commission its responsible administrator. He should be given the exclusive power to appoint and remove all employees, and should be named directly by the Governor rather than chosen by vote of the Commission. If this is done, administrative authority and accountability will be lodged in one official, directly responsible to the Governor and removable for cause.

Administrative Planning

When the parts of an organization are integrated into a pyramidal structure with single control and direction at the apex, effective planning and co-ordination become possible. Whether it will be realized depends upon the administrative ability functioning at the apex. Mediocre administration pays heed only to obvious and necessary matters, and neglects the less obvious points at which planning yields rich results.

The administration of the Registration Commission shows a lack of adequate planning. Several examples may be cited as indicative.

The Commission's most difficult administrative problem is keeping the registration lists current in the face of a large volume

of removals annually among voters of the city.¹ Reliance has been placed too largely upon the initiative of the political parties in distributing and collecting removal cards and filing strike-off petitions. More effective planning would have resulted in greater initiative on the part of the Commission in attacking this problem.

The availability of the International Business Machines equipment makes possible a sampling of different sections of the city at any time, through the process of mail check, to determine the extent of overloading in registrations. Information from such a sample check would furnish a fair indication of the condition of the entire voting list. On the basis of this information plans could be made for remedying the situation disclosed.

Field canvassing by the Commission's inspectors is less effective than it might be, as a means of attack upon the problem of removals, because of inadequate planning. In testifying before the Committee the Chairman of the Commission stated that the inspection department is not informed concerning those sections of the city from which a relatively small number of removal cards is received. Thus, if no removal cards were filed for a period of a year, or even longer, from a particular division, the inspection department would be unaware of this fact.² Information in respect to the number of removal cards received periodically in every division of the city ought to be available to the inspection department as a basis for planning the canvassing work of the inspectors. This information should be coordinated with data on the number of strike-off petitions filed by

1. For a more detailed discussion of this problem see Section II.
2. Notes of Testimony, April 14, 1941, p. 46.

divisions. These combined statistics would be invaluable in planning and establishing a systematic canvass which does not at present exist. Some divisions have never been canvassed, and not only is no method in use for covering all divisions annually, but none is employed whereby all divisions would be canvassed at least once in two or three years.

While the testimony of the Chairman of the Commission fails to disclose planning in the work of the inspection department, information obtained from the Chief Inspector indicates that some small degree of planning exists. According to this information a few divisions are regularly canvassed at least twice a year. These are divisions known to be bad because of a high transient population. Reference is made to the Commission's annual reports for the purpose of comparing the registration with the vote in particular divisions. Great discrepancies are then taken to indicate overloading. By this process, and making use of the last three annual reports, the so-called bad divisions are identified.

Another instance of inadequate planning is seen in the allocation of functions among the Commission's employees. Inspectors who receive \$6.00 a day, and whose time should be devoted exclusively to canvassing and field checks on irregularities, are assigned the purely clerical function of comparing voting check lists with the registration affidavits for the purpose of ascertaining possible fraud. This work could be performed by \$5.00 per day clerks. This point gains added force from the fact that the Chief Inspector feels he has an insufficient staff to do a first rate job.

Further evidence of the need for planning is seen in the

absence of any systematic method of correcting mistakes appearing on the face of registration affidavits. Most of these errors are the result of inadequately trained and perhaps incompetent registrars who completed the affidavits in the field at the first registration. Mistakes made at this time harass all the later work of the Commission. The correction of these mistakes is left to their incidental discovery by employees of the Commission who have occasion to work on the affidavits for other purposes.

Thoughtful consideration given to the personnel problems of the Commission would result in improvements at several points. For example, in rating its employees the Commission now relies entirely on an informal process of judgments made by the Chief Clerk and the heads of departments. These judgments are unaided by any formal rating method. Conclusions concerning the worth and ability of employees thus arrived at are notoriously unreliable because they are highly subjective, extraneous considerations of politics or personal bias having free play under such a method of employee rating.

Some effort at scientific determination of sources of error in the Commission's work has been made. An example of this is the analysis of court orders granted on election day in 1941, to ascertain the reasons for the orders and the extent to which they were necessitated by mistakes of the Registration Commission. Similar analyses to determine sources of error in the work of the Commission might be made periodically as a part of the regular routine of administration. This would of course involve the establishment of devices and records, in connection with the daily work of the several departments, from which the necessary information could be obtained. No

means, for example, now exists for determining the types of mistakes and the reasons for their occurrence in the work done in filing of original and duplicate affidavits and processing of removal cards.

Following a survey made by the Philadelphia Committee of the Pennsylvania Economy League, and at the insistence of the Chairman of the Commission, I. B. M. tabulating equipment was installed. This is a highly credible improvement in the administration of the Commission's work. It is here noted not only to give merited credit, but to point out that time spent in careful and detailed examination of existing administrative procedure, with a view to planning improvements, is fertile of results. The practice of planning might well have meant the earlier installation of this much needed change.

Personnel: Members of the Commission

The post of Registration Commissioner is a full time job. This is the plain implication of the law, which provides a \$6,000. salary. Despite this implication, the Committee finds considerable variance among members of the Commission in the amount of time devoted to their duties. It also finds that some members have been politically active at certain periods since assuming office.

Mr. Starr, the Chairman of the Commission, has not been engaged in political activity during the time of his commissioner-ship. The Committee finds that he devotes all of his time to his duties.

Mrs. McNeil devotes her entire time to her duties as a Commissioner. She has not been active politically during the period of her tenure.

Mr. Cantrell is not active in politics. His law practice prevents him from devoting extensive time to the work of the Commission, although he is frequently at the Commission's offices.

Mr. Dougherty was politically active during the recent presidential campaign. The Committee finds no evidence that he has taken an active interest in the work of the Registration Commission.

Mr. Amodei was active during the presidential campaign in 1940. So far as the Committee can discover his principal activity as a Registration Commissioner has been as a participant in strike-off hearings, and as Secretary of the Commission.

The report of the Committee appointed by Governor Earle to investigate the Registration Commission pointed out that there was no aggressive minority representation on the Commission at that time. This is still true. The Permanent Registration Act properly recognizes the two party system and contemplates minority commissioners who will really represent their party. Failure to realize this intention is a serious weakness.

Selection and Training of Employees

When the present Commission took office all of the employees were assembled and told they would be retained on merit; that their party made no difference in their future status as employees of the Commission.¹ At the time of this investigation all of the employees to whom this statement had been made had left the employ of the Commission with the exception of twelve. An explanation of this

1. Notes of testimony, January 30th, 1941, p. 72

fact was offered by the Chairman of the Commission in testifying before the Committee. He stated that a number of employees left voluntarily simply because they did not care to remain; others secured positions elsewhere, and the remainder were dismissed because the Commission found them unco-operative. Thus the Commission was largely restaffed under the present Commissioners.¹.

Concerning the twelve employees who were held over from the old Commission, it was testified that they were kept because they were in key positions.². These employees and the "key" positions they hold are indicated in the following list:

Harry O'Connell	Inspector
Theresa Schofield	Inspector and Stenographer
James McKelvey	Binder Room Employee
Albert A. MacCarthy	Charge of Map Room
John Russom	Entire charge of night gang
Edith Menold	Technical Asst. to Chief Record Clerk
Floyd Mercer	Stenographer and Registrar
Emily Boylan	Technical Asst. in Inspection Dept.
Flora Moore	Secretary for Commission
Mrs. Wickert	Stenographer and Statistician
Virginia Mullen	Stenographer and Bookkeeper
Helen Malone	Clerk and Telephone Operator

The process of obtaining new employees to replace those let out by the Commission indicates a low degree of selectivity. When asked whether new employees were examined as to their fitness, the Chairman of the Commission stated that "every employee was interviewed by the Commission as to what they had done before; if they didn't have the schooling that would fit them for the work that we had for them to do, we didn't take them."³. It is fairly evident that

1. Notes of testimony, January 30th, 1941, p. 73
2. Notes of testimony, January 30th, 1941, pp. 76-77
3. Notes of testimony, January 30th, 1941, p. 75

this process of interviewing was largely a nominal procedure. This is indicated by the educational and experience qualifications possessed by the employees as shown by their own statements. It also appears from the further fact that some 63 employees out of a total of 108 are political appointees.

New employees get virtually no training preliminary to undertaking their duties. Such instruction as is given is very limited and the principal reliance is placed upon casual learning from association with experienced workers. The testimony before the Committee shows that the training of a new employee consists of some verbal instruction by the chief of the department in which he is to work, plus what can be picked up from working with an older employee.¹ This testimony leaves the impression that new employees enter upon their duties with an absolute minimum of preparation.

Every employee of the Commission would profit immeasurably from a period of intensive instruction in the provisions of the Permanent Registration Law, and the detailed operations in the Registration office. Before such instruction could be given, it would be necessary to prepare a manual explaining the procedures under the Act and their purposes, as well as the operating routines. The Commission has prepared a four page summary description of the routines for handling new registrations, removal cards, and change of party notices. This is inadequate for the above purpose because it is not sufficiently detailed, and because it is incomplete. The process of handling strike-off petitions, for example, is not dealt with.

1. Notes of Testimony, April 14, 1941, p. 63

Qualifications of Employees

The law provides no merit system for the selection of employees. Whether competent and qualified employees are hired depends therefore upon the policy of the Commission. Judging by the education and prior experience of 100 employees as indicated by information which they themselves supplied, there has been a substantial failure to obtain personnel adequately qualified to do the work of the Registration Commission.¹.

Approximately 40 per cent of the employees (38 out of 100) had no previous business experience or vocational training that would tend to fit them for the work they are now doing. Half of the eight employees whose work involves supervision of others had no prior experience in the management and direction of subordinate personnel.

Lack of qualifying experience is most serious in that group of employees responsible for the filing work. In a system of permanent registration, no office function is more important than filing. Of the 37 employees responsible for this function, seventeen had neither previous experience nor specialized training in filing. Of the remaining twenty, only eight have had the technical training necessary to expert filing ability.

The function of inspection is carried on by seventeen employees, of whom eight appear unqualified so far as any similar employment experience indicates. Nine of the seventeen employees doing general clerical work had no previous office experience or commercial training.

1. Questionnaires were completed for the Committee by 100 of the Commission's employees; all, except those engaged in manual tasks.

The employees apparently qualified for their work are those engaged in operating the tabulating equipment, stenographers and typists, and the registrar-clerks. These are small groups of eight, seven, and eight respectively. All of the employees in each group had prior training or employment tending to fit them for their present duties.

Any deficiencies resulting from a failure to recruit personnel with appropriate training and experience are not offset by a high level of general education. About a third (31) of the 100 employees did not go beyond grammar school. Sixty-one, or nearly two-thirds have less than a full high school education. Of the remaining 39, 26 completed high school only, nine took some college work, and four were graduated from college.

More significant than this general picture are the facts with reference to the formal education of the Commission's employees by functional groups. The groups exhibiting the lowest level are those engaged in filing, inspection, and general clerical work. Conversely, the tabulating, stenographic-typing, and registrar-clerk groups show the highest level of general education. Thus the degree of educational qualification, rather than mitigating, tends to reinforce any deficiency arising from a lack of experience. On the other hand, general education is highest in those groups of employees where it is less needed.

Four of the eight supervisory employees have no education beyond grammar school. Two are college graduates. Of the other two, one attended and one completed high school.

The Committee sought to obtain from the Commission their

judgment of the competence of its staff. To that end a question was addressed to the Chairman of the Commission at the hearing held on January 30th, in which he was requested to offer his opinion as to whether the staff was competent and qualified to do the work assigned them. The answer was: "I think the staff, probably, in some instances -- we are constantly changing the men on the staff; when we find one who isn't satisfactory, we take him out and put somebody else in his place."¹.

Modern governmental administration requiring a high degree of technical competence cannot be carried on by personnel selected on the principle made notorious by Andrew Jackson that any man not fit to be hanged is fit for any public office he can get. Employees must be chosen on merit and merit alone. They must be technically qualified. The Registration Commission will not obtain such employees until it is mandatory that they be selected through a merit system. The Committee vigorously recommends amendment of the law to compel all appointments to be made on the basis of merit.

Salary Classification and Promotion

Salaries for stated supervisory positions are fixed by the Act. Section 5 further provides for the employment of "Clerks, Stenographers and Inspectors" at a salary "not to exceed \$6.00 per diem". The practice of the Commission is to pay some employees in these categories at the rate of \$6.00, others at the rate of \$5.00 per day. There appears to be no justifiable basis of determining which rate is

1. Notes of Testimony, January 30, 1941, p. 77.

applicable. The Commissioner or Commissioners who interview new employees at the time they are hired recommend that the employee be put on at the \$5.00 or \$6.00 rate. If this is agreed to by a majority of the Commission the new employee receives the proposed salary.¹.

It was explicitly stated by the Chairman of the Commission that the rate of pay had no necessary relation to the duties an employee has to perform.². Thus of two employees doing exactly the same work, one may be paid at the rate of \$5.00 and the other at the \$6.00 rate. The Committee finds that this is a source of irritation and dissatisfaction in some departments of the Commission. The purport of some of the Commission's testimony is that individual ability and performance decide the pay rate and that in recent months the higher rate has been used to promote worthy employees. The number of \$6.00 positions is limited by the appropriation ordinance. When a \$6.00 position becomes available through a vacancy, the supervisors make recommendations for advancing a \$5.00 employee. According to the testimony these are considered and acted upon by the Commission on the basis of merit.³. Statements to the Committee's investigators by some supervisors and employees, however, indicate that political considerations are mainly decisive of the salary rating.

To the extent that the \$6.00 rate is used as a promotional device, it lacks implimentation by any sound method of determining eligibility for advancement. While reasonably effective methods of objectively rating employees are available, none are used by the

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1. Notes of Testimony, April 14, 1941, pp. 41,42.
 2. Notes of Testimony, April 14, 1941, pp. 42,43.
 3. Notes of Testimony, April 14, 1941, pp. 42,43.

Commission. No written records of any sort are maintained as a check on the performance of employees with respect to production or quality of work.

A merit system for selection of employees should be accompanied by a carefully devised plan of job classification and salary standardization. This would lay the foundation for a sound policy of promotions.

Public Relations

Public relations is a neglected phase of the administrative work of the Commission. There appears to be scant recognition of the fact that a public agency created to serve the interests of more than a million electors must adopt positive measures to educate the elector in respect to permanent registration and to develop good will among the clientele it serves.

In its report of October, 1938, the Committee appointed by the Governor to investigate the Registration Commission, recommended the use of voter's identification cards. These are effectively employed in Montgomery County as a means of fostering a satisfactory relationship between voters and the registration office. A new card is forwarded in every case where the elector removes, in addition to being issued for all new registrations.

Although the use of identification cards may serve no other administrative purpose, they are doubtless of value as a public relations technique. They are not employed by the Philadelphia Registration Commission although the Commission admits that their use is permissible under the Act and that it would be both practical and

advantageous.¹. The Committee suggests amending the law to require their use.

Radio broadcasts in periods preceding elections could be used to advantage in public education in registration matters. Limited recognition of this appears in the fact that one member of the Commission, apparently on his own initiative and responsibility, cooperated with the Committee of Seventy in a series of educational programs prior to the 1940 election.

The Commission's slight recognition of its opportunity and duty to cultivate sound public relations appears in the manner in which the office removal card was introduced. This card makes it possible for a voter to effect a change of address by calling at the Commission's office, a proceeding possible previously only in the case of illiterate registrants. When this additional convenience to electors was introduced it was inadequately publicized. A great majority of the electorate was and probably is still unaware of the new service made available to them.

There is little evidence that the Commission has handled its press relations to the greatest advantage. It has not realized the possibility of encouraging the flow of removal cards continuously throughout the year by an appropriate educational campaign. Apparently little thought and planning have been devoted to the general problem of public relations.

1. Notes of Testimony, January 30, 1941, pp. 11, 12, 13.

Administrative Procedures

A number of substantial improvements in administrative procedure have been made by the present Commission. Duplicate registration affidavits are filed in what is known as the General Register. These were removed from ring shift binders and placed in indexed vertical files. The General Register was broken down into an active and inactive file, the latter containing the affidavits of all electors whose registrations had been cancelled. In the process of transferring duplicate affidavits from the ring shift binders to vertical files some 2996 duplicate registrations were discovered and eliminated.

Pursuant to recommendations by the Philadelphia Committee of the Pennsylvania Economy League, International Business Machine Equipment was installed early in 1940. This equipment is extremely useful in preparing and printing street lists, lists for use by inspectors, and mailing cards to be sent out in making the postal check required by Section 32 of the Act. It also makes possible accurate statistics of registered voters, a result previously unobtainable by the methods formerly employed for compiling such data.

To expedite the work of checking the ward and division of the old and new address in cases of removal cards, a directory was prepared by the Commission, indexing all streets in the city in alphabetical order and showing the ward and division of any particular address. The use of this volume greatly facilitates the work of handling removal cards. Formerly, identification of the ward and division had to be made by map readers. This was a slow process and the map room was a bottleneck in the processing of removal cards.

The indexed volume also serves a valuable purpose in connection with new registrations made in the field.

A simplification in the Commission's filing system was instituted by the combination of removal notices and change of party notices in a single alphabetical file. These were formerly filed separately, by ward and division. A similar improvement in the direction of greater simplicity was made in the filing of illiteracy affidavits, voting assistance affidavits and naturalization documents. The separate files for these three classes of documents were discontinued, being replaced by a single alphabetical file. A further improvement in filing resulted from the abandonment of the break down on the basis of calendar year in the filing of granted strike-off petitions. The original and triplicate affidavits are attached to such petitions. These must be located when, through use of a removal card, the registration is restored to active status. The present file is set up on the basis of ward and division and alphabetically within the division. Thus search need be made only in one place since no break down by year is maintained.

The changes noted represent significant improvements in the handling of the work which must be processed in the offices of the Commission. Believing that further improvements might be made the Committee undertook an examination of the Commission's office procedure.

The Committee finds that the general set-up of the office routine could be materially improved. As previously noted, the Philadelphia Committee of the Pennsylvania Economy League made a comprehensive administrative survey of the Commission's work, submitting

its report to the Commission in October of 1939. This survey was well done and resulted in numerous detailed recommendations. A number of these have been acted upon, but several important recommendations have not been adopted. Among the latter, two in particular deserve mention. It was recommended that the internal organization of the Commission be revised to effect a clear functional organization. The plan submitted was administratively sound, and if adopted would have produced a much more effective departmentalization than now exists.

Detailed procedures, illustrated with flow charts, were recommended. Since these were in part dependent upon the proposed reorganization of internal structure, they have not been put into effect.

Other significant weaknesses exist in the present administrative routine.

1. Filing System.

The first essential of an efficient filing system is simplicity. The more complicated the basis on which material is filed, the greater is the possibility and likelihood of error. As noted above, changes tending to simplify the several files maintained by the Commission have been instituted. The most desirable arrangement would be employment of a single master file, a general register containing not only duplicate registration affidavits, but attached thereto all documents relating to the particular registration. While this would be an ideal system, reducing several existing files to one, it is probably not feasible because of the variation in size and shape of the different forms employed, and the physical clogging that might ensue.

The second choice would be a master file to which all subsidiary files are related by a uniform system of cross-indexing. This is practical. The number on the registration affidavit is a logical basis for cross-reference between the master and subsidiary files. Under this system, the General Register would be set up as at present with the duplicate affidavits filed alphabetically. All kinds of documents relating to a particular affidavit would be marked with the number appearing on the affidavit. These would then be filed separately as at present but upon the basis of the affidavit number rather than alphabetically or alphabetically within ward and division.

Mastery of a numerical filing system is far simpler than where filing is done on an alphabetical basis. The most expert file clerks should be placed in exclusive charge of the General Register, no other persons having access to this master file. The filing in the subsidiary files on a numerical basis might then be done by less expert clerks with less probability of error than at present.

It may be noted in this connection that the Registration Commission of Pittsburgh successfully uses a similar filing method for cross-indexing duplicate affidavits and removal cards.

If it is to be accurate, every extensive filing system must be subjected to a periodic audit to locate and correct misfiled items. It is not the practice of the Commission to make periodic file audits. That these are necessary is unmistakably indicated by the Committee's findings on the accuracy of the Registration Commission's most important files.

The original affidavits, which are the basis of determining eligibility to vote, are filed in district binders. The duplicate

affidavits are filed in the General Register (active section), which is the master office file. The Committee made a sample check of both these files, employing a statistical procedure similar to that used to determine the number of illegal registrations in the voting lists. The results show that the district binders contain, within outside limits of error, between 14,208 and 33,881 misfiled affidavits. The General Register contains between 25,137 and 49,182 misfiled affidavits.

It is not to be concluded that all of these misfiled affidavits are lost. The filing error may be of such a nature that the affidavit appears close enough to the place where it properly belongs, to be located. Where this is the case, it is a fortunate accident. Without doubt a substantial number of the misfiled affidavits are lost.

This is a serious condition and shows not only the need of periodic audit, but also that filing performance is substandard. A commercial company whose business depends upon an accurate performance of a huge filing task, has reduced its filing error to 0.5 per cent. This probably represents maximum efficiency. The percentage error found in the Commission's files ranges between 1.3 and 3.1 per cent for the district binders, and 2.3 and 4.5 per cent for the General Register.

2. Processing of Removal Cards

At least two serious deficiencies exist in the present method of handling removal cards. In effecting the change of address on the affidavits, a strip of paper is pasted across the bottom of the affidavit form. A typist then enters the name and new address. In

cases where a prior removal has occurred, the old strip must be removed from the affidavit.

This procedure is extremely time consuming. It is estimated to account for approximately 30 per cent of the entire time required to process a removal card. No conceivable purpose is served by thus stripping the new address on the bottom of the affidavit form. Each affidavit contains space for entering a new address in the event of change of residence of the voter. Further, the practice violates the provision of the Act which requires the entry of the new address in the space provided on the form (Sec. 20-c). Stripping in of names and addresses on the original affidavit also violates Section 27 (a) of the Act which stipulates different information to be shown on the last line of the affidavit.

Failure to provide an adequate check on the receipt of the removal cards is a major shortcoming. No automatic method exists for determining whether the Commission did or did not receive a removal card which a voter alleges was sent through the mail or delivered through a party worker. The problem is to secure a receipt identifying each removal card without any substantial additional work. This can be done by attaching a removable receipt stub to the card. By means of a time clock, the date and hour of receipt can be stamped on both the card and the attached stub and a common serial number stamped on both. This will completely identify the receipt, which can be returned to the elector as proof that his removal card has been filed with the Commission, and of the date and hour of filing. It will also prevent advance dating of removal cards, which the Committee finds has occurred.

3. Check of Registration Affidavits against Voting Check Lists.

Section 39 of the Act requires the Commission to compare each district register with the voting check list, following each primary and general election, for the purpose of discovering discrepancies in the signature or other possible evidence of fraud, impersonation, or forgery. This work is done in part during the 30 day period following each primary or election and when (under Section 17-a) the registration office is closed to new registrations. A large part of the staff is assigned to this task during this 30 day period. Approximately 30 employees following the fall 1939 election and 50 following the election of 1940 were used in making the comparison. The job is too extensive to be completed within the 30 day period. Although the provision of Section 17 (a) contemplates completion of the check during the 30 days, it is necessary to continue this work throughout the entire year. Since as a practical matter the process is continuous the year around, it would seem desirable to assign certain clerks exclusively to this function. This is not done at the present time. On the contrary many employees are taken from other duties at different periods and assigned to this work. It seems particularly unwise to withdraw inspectors from their normal duties and put them to work on this check. The effective operation of the inspection department requires the employment of all inspectors for inspection work every working day of the year. At two different hearings members of the Commission stated that inspectors were used for making the voting check list comparison.¹.

1. Notes of Testimony, Jan. 30, 1941, p. 22 ff., and April 14, p. 38.

The employment of a varying personnel for the purpose of this check loses the value of specialization. Workers assigned exclusively to this task, as is done in the Registration Office of Montgomery County for example, may be expected to develop a high degree of competency, which will reflect itself in greater certainty in the detection of possible fraud and in a much higher rate of production.

Since the Act provides for the cancellation of a voter's registration in the event he fails to vote during a four year period, it is obviously important to determine whether the voting record on the back of the registration affidavit is correctly completed by the election officials. This could be done by means of a comparison of the voting check list with the entries made on the reverse side of the affidavit. Testimony adduced before the Committee indicates that no such comparison is undertaken.¹.

It is not difficult to foresee considerable annoyance to electors, when the four year provision is given effect, resulting from failure to make this check and to have the affidavits corrected where necessary. Justifiable complaints will be made by many voters if the election officials have failed to enter the fact of their vote and nothing has been done to rectify the error.

4. Systematic Check of Affidavits.

While it is freely admitted that the circumstances under which the original registration was taken in 1937 caused numerous mistakes in the completion of registration affidavits, the Commission

1. Notes of Testimony, Jan. 30, 1941, p. 31.

has informed the Committee that no systematic process has been instituted for correcting the records. At times action has been taken to deal with specific situations brought to the attention of the Commission, as for example in the case of naturalization data.

The importance of maintaining active registration records in an accurate, current status needs no arguing. It would appear that alert administration would provide a method of constant auditing of all live affidavits for the purpose of eliminating errors of every sort. Other registration commissions have seen the need for such a systematic check. The Committee finds, for instance, that a process of this kind is employed by the registration office in the City of Pittsburgh.

5. Triplicate Copy of Affidavit.

The triplicate copy of the affidavit was devised originally to provide a basis for the preparation of street lists. To that end the Act required the filing of these triplicates by street and number. With the installation of tabulating machinery and the provision of a tabulating card for each registration, the further employment of the triplicate becomes unnecessary. Street lists may now be prepared much more rapidly and more accurately by means of the machines. The work in handling and filing more than a million of these triplicate copies can be eliminated with no sacrifice whatever to the efficiency of operations. This will cut down the time required in filing new registrations by a third, and greatly reduce the work in processing removal cards. The provision for the triplicate therefore should be stricken from the law.

6. Vital Statistics Reports.

While it does not concern procedure in the office of the Registration Commission, it seems appropriate at this point to note that serious difficulty in the handling of reports of deaths has arisen from failure of the Registrar of Vital Statistics to comply with the duty imposed under Section 31 (a). The Committee found that no reports were received from the Bureau of Vital Statistics during the first two months of the present Commission's tenure. Since there had been a failure to forward reports for quite some time under the former Commission, a back-log of unreported deaths accumulated. This situation caused unnecessary delays in the cancellation of registrations because of death. It is felt that difficulties of this kind are needless and that the failure of the Registrar of Vital Statistics to provide reports should be made a cause for his removal from office.

Physical Factors

The effectiveness of the work done in the Registration Office is conditioned by the physical layout under which the office must operate. Very serious limitations exist because the problem of location and physical arrangement of the office has not been successfully handled. The report of the 1938 investigating committee noted that the location of the Registration Office on the 14th floor of City Hall Annex, a building with inadequate and slow elevator service, tended, along with other factors, to cause "would-be registrants to surrender their right to register" because of the great inconvenience. More than two years have elapsed since this criticism was made. The situation has not been remedied.

It is recognized that this is a problem the solution of which partly depends upon co-operation of the city authorities. It is felt, however, that persistent and strong efforts to obtain more satisfactory quarters would have produced results. It is difficult to imagine a forceful administrator putting up with crippling conditions of work of this sort for such a long period.

The physical arrangements in the office of the Commission are presently unsatisfactory. The most casual observation of working conditions in the binder room must impress anyone of the validity of this conclusion. So many employees are at work in such a limited space that they are patently in each others way. It is inconceivable that really effective work can be done under these circumstances.

Some time ago the Philadelphia Committee of the Pennsylvania Economy League made a careful study of the physical layout of the Commission's offices and submitted to the Commission a blue print proposing a rearrangement. The recommendations made by the Economy League, if carried out, would result in marked improvement. The Commission has seen fit to act upon these recommendations only to a very limited extent.

Appendix I

SAMPLING METHOD

A complete investigation of 1,092,924 registrations to determine the number improperly in the voting registers was impossible. It was necessary to take a sample. For reliable results, any sample study must meet two criteria: representativeness and adequacy.

To obtain a representative sample, it is necessary to know the significant characteristics of the whole field under study. This was not possible for registration records in Philadelphia until the Housing Survey for Philadelphia was published.

The vast majority of affidavits improperly in the voting binders are there because voters have moved and the records have not been corrected. But voters in some sections of the city move more frequently than voters in other sections. This is the significant fact which must be accurately reflected in any sample claimed to be representative. The housing survey made available for the first time data on the frequency of moving for dwelling occupants for each minor block in the city, and thus for the first time made possible a scientific sampling of the records of the Registration Commission. Previous sample investigations necessarily had to rely upon rough and somewhat unreliable appraisals of voting divisions as "good" or "bad", as having a high or low "rate of turnover". Nor was there any method of determining what percentage of the registrations were in good or bad sections in order that the sample might be made up in corresponding proportions.

The pattern necessary, if the sample was to be representative, was determined by using the distribution of dwelling units within ten large areas of the city on the basis of duration of occupancy as revealed by the Real Property and Low Income Housing Survey made for the Philadelphia Housing Authority.¹. In defining these areas, ward boundaries were observed. Hence it was possible to ascertain the number of registered voters in each area.

It was assumed that the distribution of these registered voters with respect to frequency of removal would roughly approximate the known distribution of the area on the basis of rate of occupancy. The number of voters in each class of duration of occupancy could thus be found. By combining the results for all areas, the number and per cent of registered voters in each class for the entire city were determined. This gave the pattern of the sample or the percentage required in each occupancy rate. This is shown in Table III.

To obtain the sample items in conformity with this pattern it was necessary to know particular blocks in the city where the several classes of duration of occupancy were likely to occur. This information was gotten by examining and classifying, by preponderance of a particular category of occupancy rate, the data for each minor block in the ten areas of the city.

Investigators were then sent to different sections of the city to secure the requisite proportion of cases in the several categories. In addition to obtaining the basic registration data needed,

1. This data appears on page 34.

they got information on length of residence so that each case could be classified with reference to duration of occupancy.

The actual percentage distribution by occupancy rate of the cases included in the sample is shown in Table III. This table also shows the difference between the actual and the required percentage, or the degree to which the sample conforms to the pattern and is representative of the universe being sampled.

Calculations for determining the adequacy of any sample of a binomial distribution are made by use of the basic formula for derivation of the standard deviation. This formula is $\sigma = \sqrt{\frac{PQ}{N}}$, where σ = standard deviation, p = percentage of occurrence, $q = 1 - p$, and n = total items in the sample.

Using this formula, Professor Brown of Harvard developed a table showing the sizes of random samples necessary under different percentages of occurrence and for varying ranges of accuracy. This table was employed as a guide in fixing the size of the sample in the present study.

Having selected on this basis a sample deemed adequate, while also fitting the requirements of representativeness, the formula was then employed to determine the range of error, since the actual number of items in the sample was known and the actual percentage of occurrence established.

It was decided to determine the range of error within two standard deviations. This decision was based first, upon the fact that while the formula applies to random samples, the sample in the present instance is representative. This means that the measures derived from the sample are much more likely to conform to the universe

being sampled than if a random sample had been employed. Further, use of two standard deviations was considered to offer a sufficiently high probability in calculating the range of error. A range of error resulting from two standard deviations signifies a probability of 21 to 1 that the true percentage of occurrence will fall within the limits defined by the measure of error. Because the sample is representative rather than random, these limits become conservative.

With this explanation, the translation of the formula into terms of the present study may be stated. Since the purpose was to determine the proportion of correct and incorrect registrations (binomial distribution), p becomes the percentage of incorrect registrations disclosed by the sample. As indicated above, q is a relationship of p . The total number of registrations investigated in the sample constitutes n .

A total of 2259 cases were included in the sample. These were selected from approximately 10,000 cases investigated, covering more than 100 city blocks. This large number had to be investigated in order to obtain the necessary proportions to make the sample conform as closely as possible to the representative pattern. Twenty-two divisions located in twelve different wards are represented by the 2259 cases. How these are distributed among the six classes of duration of occupancy is indicated in Table I. This table also shows the wards and divisions in which the 2259 cases are located.

The findings of the sample are disclosed in Table II. A voter whose registration was in the district register and who was still resident at the address listed was considered a case of correct

registration. Also considered as correct were cases where voters had moved or died and the affidavit had been removed from the binder. Cases of illegal registrations occurred then, where registrants moved or dead still had their affidavits in the binders. As revealed in Table II, there were 238 such cases or 10.5 per cent of the sample. Limits of error applied to this percentage give the outside figures of 9.2 and 11.8 per cent.

Finally, it should be noted that the method here described makes it possible to employ a very small sample to obtain highly accurate results.

TABLE 1

DISTRIBUTION OF SAMPLE

By Duration of Occupancy

Ward and Div.	11 mo. or less	1 yr. to 1 yr. 11 months	2 yrs. to 2 yrs. 11 months	3 yrs. to 4 yrs. 11 months	5 yrs. to 9 yrs. 11 months	10 yrs. and over	Total
35-33	2		1	2	32		37
15-15	54	27	26	6	23	9	145
50-23	10	15	44	142			211
35-33	2	3	1		42		48
38-31	11	10			10	29	60
46-24	4	5	4		7	21	41
38-11	17	11	4	3	6	31	72
14-3	19	32	14	22	21	17	125
40-24	14	9		15	25	68	131
25-6	10	2	10	13	17	110	162
25-26	1	2	3	16	3	62	87
40-26	21	10	5	15	16	26	93
25-5	5	3	14	5	5	72	104
32-20	10	4	1	1	23	41	80
29-19	9	20	5	7	11	38	90
44-12	12	6	7	11	15	49	100
34-46	7	13	18	19	24	60	141
35-49	2	28					30
35-41			25				25
50-1	25	8	22	12	95	90	252
50-34	2	4	3	32			41
34-48	12	8	8	9	18	36	91
34-51	5	6	4	10	39	29	93
Total	254	226	219	340	432	788	2259
Percent	11.25	10.00	9.69	15.05	19.12	34.89	100.0

TABLE II

AFFIDAVITS IMPROPERLY IN BINDER
By Ward and Division

Ward and Division	Total	Voters Still Resident	Voters Removed or Dead	
			Binder Not Corrected	Binder Corrected
35-33	37	34	2	1
15-15	145	82	37	26
50-23	211	199	9	3
35-33	48	47	1	
38-31	60	51	6	3
46-24	41	35	5	1
38-11	72	52	14	6
14-3	125	84	6	35
40-24	131	114	11	6
25-6	162	135	19	8
25-26	87	81	5	1
40-26	93	60	27	6
25-5	104	93	11	
32-20	80	66	9	5
29-19	90	69	16	5
44-12	100	82	12	6
34-46	141	117	10	14
35-49	30	30		
35-41	25	25		
50-1	252	214	27	11
50-34	41	36		5
34-48	91	78	4	9
34-51	93	84	7	2
Total	2259	1868	238	153
Per Cent	100.0	82.7	10.5	06.8

TABLE III

REPRESENTATIVE CHARACTER OF SAMPLE

Comparison of Sample Requirements
with Actual Sample

Occupancy Rate	Required Percentage	Actual Percentage	Difference
11 months or less	11.74	11.25	- .49
1 yr. - 1 yr. 11 mo.	9.48	10.00	+ .52
2 yrs. - 2 yrs. 11 mo.	9.25	9.69	+ .44
3 yrs. - 4 yrs. 11 mo.	14.78	15.05	+ .27
5 yrs. - 9 yrs. 11 mo.	18.71	19.12	+ .41
10 yrs. and over	36.04	34.89	- 1.15

Appendix II

LIST OF SPECIFIC CHARGES INVESTIGATED

1. Excessive Registrations in Apartment Houses

4605 Chester Avenue - Chester Plaza
4618 Chester Avenue
47th and Locust Streets - Garden Court Plaza
237 S. 48th Street - Admiral Apartments
4710 Locust Street - Dorset Apartments
4800 Pine Street - Pine Vista Apartments

2. Registrations from Vacant Lots and Dwellings

110 S. 20th Street
418 S. 24th Street
1503 Kater Street
1008 Clinton Street
1824 Ludlow Street
1905 Naudain Street
1915 Naudain Street
739 E. Passyunk Avenue
340 S. 24th Street
613 S. 17th Street
528 S. 11th Street
243 N. 10th Street
209 S. 10th Street

3. Complaints of Excessive Registrations Filed with Senate Committee

1421 Arch Street - Y. M. C. A. Hotel
34th and Pine Streets - Philadelphia General Hospital
212 N. 9th Street
218 N. 9th Street
230 N. 9th Street
232 N. 9th Street
250 N. 9th Street
254 N. 9th Street
1702 South Street

4. Miscellaneous Complaints Filed with Senate Committee

Florence Rosenstein - 5126 Pulaski Avenue
Edward S. Berry - 1552 N. Alden Street
James A. Maley - 6217 Stiles Street
Marie C. Kane - 5409 Akron Street
Rosalie Novak - 2038 N. 12th Street

Marie Grispon - 4241 Ridge Avenue
Joseph Leadly - 4219 Ridge Avenue
Anna I. Parkes - 2532 N. 30th Street
Ella Green - 1852 N. 22nd Street
Frank Adams - 1021 W. Montgomery Avenue
Curtis Johnson - 1021 W. Montgomery Avenue
Louella Johnson - 1021 W. Montgomery Avenue
Julie Scott - 1021 W. Montgomery Avenue
New Scott - 1021 W. Montgomery Avenue
William King - 1021 W. Montgomery Avenue
James Tate - 1018 W. Berks Street
Barney Parks - 1018 W. Berks Street
Cheanth Wardlov - 1025 W. Euclid Avenue
Annabel Nelson - 1914 N. Warnock Street
Ray Jackson - 1958 N. Warnock Street



